DOUBLE EAGLE
STEEL COATING COMPANY

3000 Miller Road
Dearborn, Michigan 48120
Telephone (313) 203-9800

August 18, 2006

via Certified Mail, Return Receipt Requested

James A. Day
Environmental Quality Analyst
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
South East Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

Re: May 31, 2006 Letter of Violation to Double Eagle Steel Coating Company: MID981092190

Dear Mr. Day:

Double Eagle Steel Coating Company ("DESCC") is writing in further response to MDEQ's May 31, 2006 letter that alleged violations of hazardous and liquid waste management requirements. As indicated in our June 30 response, there were several sets of requested documents that took some additional time to collect. We are writing now to enclose those documents.

This effort took longer than expected due to the reassignment of the contractor, Marc Swientoniowski, who had been assisting DESCC with environmental issues; Mr. Swientoniowski was reassigned by his employer, and not at DESCC's request.

Enclosed with this letter are:

1. As requested in the Additional Clarifications section of your letter, regarding the Beneficial Reuse Issue, copies of bills of lading for shipments of caustic to Dynecol for beneficial reuse have been provided. You requested copies of bills of lading from February 2005 through March 2006. Copies of bills of lading dating back through June 2005 were located initially, and bills of lading from June 2005 through May 2006 were enclosed with our June 30 letter as Exhibit 9. Enclosed with this current letter are additional bills of lading covering the time period of February 2005 through September 2005.

Based on the additional bills of lading collected, we have prepared a revised spreadsheet listing shipments from Tank 12; this updates the listing provided as Exhibit H to our April 28, 2006 letter.

2. MDEQ's May 31st letter identified several waste approval numbers listed in Exhibit N which were not enclosed with our April 28th letter. You requested that copies

of the corresponding waste approvals be provided. Accordingly, we are writing to enclose the following documents:

a. Approval # 71205-0, from Usher Oil.

b. Approval # 080805-0, from Usher Oil.

c. Approval # K07502, from EQ Industrial Services

d. Regarding approval # 093002, this approval was issued by Edwards Oil Service. Edwards Oil is no longer in business, and a specific copy of the waste approval could not be located. However, the Edwards Oil approval numbering system was based on the date of issuance of the approval. In this case, the approval was issued on 09/30/02. A copy of a November 1, 2002 letter from Edwards Oil accepting a used oil waste profile submitted on or about September 26, 2002 is attached. It is believed that this waste profile was approved on September 30, 2002, and received the waste approval designation of 093002.

e. Approval # FF05293, from EQ Detroit.

f. Approval # HF054693, from EQ Detroit.

g. Approval # 12279, from Polar Environmental Services.

3. Additionally, DESCC needs to revise some of the information provided in our June 30 letter regarding two specific non-hazardous waste shipments that you asked about in your May 31 letter.

a. Regarding the 4/06/05 shipment to EQ Resource Recovery. The correct waste approval number is K07502, and not DO06459. DO06459 later replaced K07502 after K07502 expired. However, at this time of this shipment, April 2005, K07502 was the effective waste approval for shipments of this material to EQ Resource Recovery.

b. Regarding the 1/9/06 shipment to EQ Detroit, further investigation has determined that the Exhibit N spreadsheet listed the wrong receiving facility, and not the wrong waste approval number. The listed waste approval number, 080805 is correct. However, this shipment went to Usher Oil, not EQ Detroit. Waste approval 080805 is an Usher waste approval. DESCC has checked with Usher and confirmed that this shipment was received by Usher.

Waste Characterization Issue

As indicated in our June 30 letter, DESCC is willing to conduct testing to confirm its characterization of several types of material generated at DESCC. Per your request, DESCC is allowing time for MDEQ to comment on the proposed testing for each of the

relevant materials. To date, DESCC has not received any comment on this issue from MDEQ. We wanted to offer MDEQ an additional opportunity to comment on the proposed testing, before conducting it, to ensure that we are proceeding on the most efficient path. Please advise us if the analyses proposed in our June 30, 2006 letter are a satisfactory response to your characterization request.

Please direct any inquiries regarding the foregoing responses to our environmental counsel, Scott Dismukes at 412-566-1998.

Sincerely,

Tom Kevin
Plant Manager

Enclosures
cc: Mr. Duncan Campbell, U.S. EPA
Mr. Donald S. Windeler
Robert F. Casselberry, Esq.
Scott R. Dismukes, Esq.

DOUBLE EAGLE
STEEL COATING COMPANY

3000 Miller Road
Dearborn, Michigan 48120
Telephone (313) 203-9800

April 28, 2006

via Certified Mail
Return Receipt Requested

James A. Day
Environmental Quality Analyst
Waste and Hazardous Materials Division
Michigan Department of Environmental Quality
South East Michigan District Office
27700 Donald Court
Warren, MI 48092-2793

Re: March 29, 2006 Letter of Warning to Double Eagle Steel Coating Company: MID981092190

Dear Mr. Day:

With this letter, Double Eagle Steel Coating Company ("DESCC") responds to your March 29, 2006 Letter of Warning. DESCC understands that your March 29 letter was based on facility inspections conducted by both the Michigan Department of Environmental Quality ("MDEQ") and the United States Environmental Protection Agency ("U.S. EPA") on February 27, 2006 and a follow up MDEQ inspection conducted on March 7, 2006. Your March 29 letter directed that we provide our response by April 28, 2006. DESCC requested an extension of time to respond to your March 29 letter given the end of March departure of the facility's environmental engineer, Chris McBee, and the volume of information requested by your letter. To our surprise, the MDEQ denied our request. Accordingly, under these staffing circumstances and the limited time available to respond to the lengthy and detailed request, DESCC is responding to your March 29, 2006 letter to the best of our ability.

Our review of your March 29 letter suggests you are focusing on three primary issues, with a number of subparts. As we understand it, the three primary issues are:

1) Ensuring the protection of the environment from releases of characteristic hazardous waste liquids and liquid industrial waste;

2) Providing notification to the MDEQ of "release incidents" and maintaining written documentation of any incidents and response actions taken; and

3) Ensuring DESCC has updated characterizations of its liquid industrial waste and hazardous waste that are of sufficient scope and frequency to ensure adequate characterization and management of these materials.

We also understand that you are inquiring with respect to several issues associated with used oil, final disposition of used oil, Tank 12 waste accumulation time and DESCC completing an updated Site Identification Verification Form. We are responding to the issues raised in your March 29 letter in the order described immediately above.

Storage Tank and Secondary Containment System Integrity

The first issue noted above appears to be a concern whether the integrity of Tank 12 and secondary containment "system" is sufficient to prevent a release of hazardous waste or liquid industrial waste to the environment. In this regard, the September 15, 1997 report by Chester Engineers, authored by Brian Alexander, P.E., CHMM (the "Chester Report"; see Exhibit A) certified Tank 12 and its secondary containment "system" as meeting the construction and compatibility requirements for tank systems containing or managing D002 waste sufficient to safeguard against a release of material to the environment. Since the Chester Report, visual external inspections have not revealed signs of shifting or cracking, and DESCC has had no reason to believe the Tank 12 system has not continued to be effective for the storage and containment of a D002 waste stream.

The liquid material periodically contained within the Tank 12 secondary containment is the result of periodic overflows of Tank 12, and not the result of a physical break or a malfunction that would require repair. Tank 12 is inspected on a daily basis. DESCC is in the process of reviewing its tank inspection checklist to enhance the recordkeeping of the daily inspections. A copy of the checklist will be submitted to supplement this letter, by May 15, 2006. Additionally, Tank 12 sits on a four (4) foot high concrete pad above the secondary containment area, and any leaks from Tank 12 would be visible on the pad; there is no such indication of any leaks from Tank 12.

The secondary containment is also inspected on a daily basis. Removal of liquid from the secondary containment is managed according to best management practices based on the judgment of the operator, with consideration given to factors such as the level of liquid, weather conditions and the availability of vacuum truck services. DESCC's operating practice S-01-59-10 Holding Tank 12 calls for the containment area to allow sufficient room for a release from Tank 12, should such occur. See Exhibit B. A list of waste shipments of liquid from the secondary containment area is attached as Exhibit C.

In response to the concerns expressed by MDEQ, DESCC is in the process of revising its SOP for removal of liquid from the containment area. DESCC anticipates that the revised SOP will require daily monitoring of the liquid level, and removal of the liquid as soon as reasonably practicable any time there is caustic in the containment area or the depth of the liquid in the containment area exceeds six (6) inches. This procedure will ensure that there is always sufficient room in the containment area to accommodate 100% of the full volume of Tank 12, should a catastrophic release occur. A copy of the revised SOP will be provided to supplement this letter, by May 15, 2006.

In 2005, as part of routine facility maintenance, DESCC embarked on a project to reline several secondary containment areas. As part of this overall project, a bid was obtained for relining of the Tank 12 secondary containment area in January 2006. (A copy of the

relevant bids and Purchase Order are attached as Exhibit D). That relining project for the secondary containment areas was begun in the fall, suspended due to weather concerns over the winter, and has now been resumed. The relining of the Tank 12 secondary containment area was completed on April 22, 2006. During the course of this work, the contractor, General Acid Proofing, Inc., observed the condition of the containment area, and reported that no holes, cracks or defects in the concrete of the containment structure were observed. A professional engineer will review the relining of the containment area by May 31, 2006.

Accordingly, the Tank 12 "system" has been demonstrated in the past to have sufficient integrity to handle a D002 waste stream, current evaluation of the system demonstrates that it has continued to operate in good condition, and future operating practices will continue to ensure that the integrity of the tank and containment system are maintained. In sum, we do not believe that these circumstances constitute a hazardous waste and/or liquid industrial waste notification event as identified in your letter.

Nevertheless, we are cognizant of your concern regarding the frequency with which D002-type materials are contained within the secondary containment structure. While the presence of this material in the secondary containment is not improper, so long as there is no release from the secondary containment to the environment, we share your concern about the frequency of these events and are currently conducting a review of the operating procedures plant-wide as they affect the material contained within the Tank 12 system.

In this regard we have completed the following: The Tank 12 system is designed with high level alarms and overfill protection. The high level alarm has been repaired, and was most recently tested on April 16, 2006. Going forward, it will be tested on a monthly basis to ensure that it is operating properly. The high level alarm causes shut-off of the sandpiper (sump pump) units that collect liquids from the process area and automatically pump the liquid to Tank 12. This will prevent liquid from the sandpipers from causing an overflow of Tank 12. Additionally, because liquids are also pumped manually to Tank 12, the relevant employees will be retrained on existing procedures to limit overfilling of the Tank and ensure inspection of liquid levels and removal of liquid from Tank 12 when the level in Tank 12 is greater than 85 inches. Please see documents attached as Exhibit E regarding this procedure and recent retraining of the employees about this procedure.

We are also evaluating the possibility of rerouting the overflow piping for Tank 12 so that any overflow would be directed back to the HCD trench in the building, and would not flow into the Tank 12 secondary containment area.

DESCC Is Not Required To Notify MDEQ Of Events Which Do Not Constitute A Release To The Environment

DESCC is aware of the various requirements to provide the MDEQ with notification of a release of hazardous waste or liquid industrial waste materials to the environment. Historically DESCC has provided notification to MDEQ when such incidents have occurred at its facility. Under the current circumstances, with the integrity of the

Tank 12 secondary containment system demonstrated both by the appropriate Chester Report engineering certification and subsequent routine inspections, we are not aware of any information suggesting there is a release of hazardous waste or liquid industrial waste from the tank system to the environment. Nevertheless, as described above in our discussion regarding the integrity of the Tank 12 system, DESCC is taking efforts to decrease the frequency of overfills into the Tank 12 secondary containment.

Under these circumstances, DESCC is not aware of any requirement to provide notification to the MDEQ of events, which do not constitute a release to the environment.
Should we be incorrect in our understanding that notification to the MDEQ is only required for events, which constitute "releases to the environment", we would welcome discussions with your office to ensure that the appropriate procedures and practices are followed at our facility.

Waste Characterization

Your March 29 letter expresses specific concern with respect to whether DESCC has appropriately characterized the waste material going to Tank 12, the Tank 12 secondary containment, Tanks 43 and 44, and filter cake, which is more appropriately identified as the filter press for the plating solution (as opposed to wastewater treatment pretreatment).

Initially, because proper waste characterization also includes the application of "generator knowledge" DESCC states that the processes and waste streams associated with the Tank 12 system, with Tanks 43 and 44, and with the filter press for the plating solution have not changed, and have remained constant, since at least January 2000. Over this time period, DESCC's relevant production, raw material usage and processes employed have remained the same.

DESCC recognizes your specific concern with respect to pH levels of spent caustic bath. Initially, it should be pointed out that the caustic material collected in Tank 12 is typically sent for beneficial reuse to Dynecol, in Detroit, Michigan. Attached, as Exhibit F is a Waste Approval Form Recertification Form from Dynecol that states that Dynecol is using the Tank 12 caustic as a substitute for a commercial product. Also attached, as Exhibit G, is a Dynecol letter to MDEQ describing how it beneficially reuses materials that it receives (note – the Dynecol letter addresses a different waste stream from another supplier, not DESCC, and is being submitted just as an example of how Dynecol handles materials for beneficial reuse).

The determination of whether the caustic is sent for beneficial reuse or disposed as hazardous waste is made after the material is removed from Tank 12. This determination is made by Dynecol, and depends on whether the material meets Dynecol's specifications and whether Dynecol has a need or use for the material. A list of shipments of the caustic from Tank 12, either for beneficial reuse or as hazardous waste, are attached as Exhibit H.

Copies of characterizations of the caustic material are attached as Exhibit I, and include: An April 4, 2006 General Approval Notification from The Environmental Quality Company, which includes waste characterization data from 2001; and an August 30, 2002 analysis from Clayton Group Services of samples from Tank 12 and the downturn caustic (the liquid stream feeding Tank 12). Additionally, please see the Waste Approval Recertification Forms from Dynecol in Exhibit F.

A small amount of oil can separate from the solution contained in Tank 12. This oil is skimmed from Tank 12 and is sent to Environmental Quality as hazardous waste. An April 11, 2006 "corrosivity" analysis identified this used oil as non-hazardous. In addition, applying our generator's knowledge, this process has remained stable and has not changed for many years. Copies of characterizations of the used oil from Tank 12 are attached as Exhibit J, and include the April 11, 2006 analysis from Schrader Laboratories. A certified 2005 Used Oil profile submitted to Usher Oil Company is also included in Exhibit J. In the future, if used oil removed from Tank 12 meets Usher's specifications, it will be sent to Usher as used oil.

In addition, copies of a certified Used Oil profile submitted to Usher Oil Company for the used oil from Tanks 43 and 44 is attached as Exhibit K.

The issues in your letter regarding filter cake may represent some confusion on your part regarding our process. The filter cake we believe you are concerned with is filter cake generated from the filter press for our plating solution, not filter cake associated with wastewater. The filter press located near Door 10 is designed to filter active process plating solution. This filter press is not associated with any wastewater. Attached to this response is waste characterization documentation from 2005 and 2006 for the disposal of the filter cake from the filter press for the active process plating solution. (See Exhibit L.) In addition, applying our generator's knowledge, this process has remained stable and has not changed for many years. This characterization demonstrates it is non-hazardous and is representative of this particular process. This material is currently disposed as industrial liquid waste sludge because it does not pass the paint filter test. We believe that this characterization is sufficient to ensure the adequacy of the characterization on an ongoing basis. We would be happy to discuss this practice further to ensure that no further confusion remains, and achieve a consensus that existing procedures are adequate.

Your letter also expresses interest in hazardous waste and liquid industrial waste characterization facility wide. Accordingly, copies of waste stream characterizations are attached as Exhibit M.

DESCC does not utilize written operating procedures for managing waste characterizations. Instead, DESCC operators use their best professional judgment to manage the waste streams and comply with applicable TSD requirements in order to facilitate disposal of the waste material. All of the waste characterizations are, and have been, maintained with the environmental waste management files. To the extent there was any confusion during MDEQ's inspections regarding the location and availability of these waste characterizations, DESCC regrets any such confusion that may have been caused by Mr. McBee's lack of familiarity with these records during the inspections.

Used Oil

Your March 29 letter raises concerns regarding the storage of used oil and the need to label or mark all containers as "Used Oil." To the extent that the material contained within the Tank 12 system is characteristically hazardous waste, we are concerned that the suggestion to mark the tank as a "used oil" tank may conflict with the requirements associated with hazardous waste. It is our understanding that mixtures of used oil and characteristically hazardous waste are typically regulated as hazardous waste rather than used oil. Of course, should our understanding of this issue be incorrect or require refinement, we would appreciate the opportunity to discuss it with you to ensure that the facility is following the appropriate practices, procedures and marking requirements.

You have also inquired as to our activities to ensure the integrity of Tank 12 and associated secondary containment, as that issue relates to used oil storage and the release or potential release of used oil to the environment. We believe that the discussion above regarding hazardous waste and liquid industrial waste and the integrity of Tank 12 and the Tank 12 secondary containment system should address your similarly stated concerns under used oil. We also note that potential conflict between the hazardous waste and used oil regulations as noted immediately above. Please let us know if the MDEQ is of the opinion that there are other additional requirements not otherwise covered by the preceding discussions.

90-Day Storage Accumulation

The March 29 letter also raises several ancillary issues, the first of which is concern regarding DESCC demonstrating compliance with the 90-day accumulation time for material stored in Tank 12. In that regard, the throughput of material in Tank 12, which is a 20,000 gallon tank, is such that the contents of the tank turns over many times during any given 90 day period. When the caustic material from Tank 12 is sent for beneficial reuse, it is withdrawn near the bottom of the tank. It is removed with a frequency and volume that demonstrates that none of the caustic material remains in the tank for more than 90 days. Please see the list of shipments of materials from Tank 12, attached as Exhibit H.

The March 29 letter also inquires about the disposition of used oil to be recycled or disposed. Accordingly, enclosed for your review are spreadsheets detailing the final disposition of all used oil from the entire facility from March of 2005 through the present. See Exhibit N. The supporting manifests for used oil shipments for the past several years are voluminous, and are not being attached to this letter. If you would like copies of the manifests to be provided, please advise us.

The March 29 letter also inquired as to the current status of DESCC's Site Identification Verification Form ("SIVF"). At the time of the February 27 and March 7 inspections of DESCC's facility, the SIVF on file with your office was correct as of the time of the then most-recent filing of the facility's biennial report. In response to your letter and to address the recent change in personnel, we have enclosed for your files the revised

SIVF form filed with the biennial report submitted this year; the revised SIVF, dated March 20, 2006, contains updated contact personnel information. See Exhibit O.

We hope that this response addresses the majority of issues raised in your March 29, 2006 letter. To the extent there remain open issues, which we need to discuss with your office, please contact us to schedule the appropriate meeting or telephone conference. Further, should you require additional information related to any of our responses here, please contact us directly in writing specifying that additional information required and we will respond in due course.

With the departure of Mr. McBee, please direct any inquiries to our environmental counsel, Scott Dismukes at 412-566-1999.

Sincerely,

Tom Kevin
Plant Manager

cc: Mr. Duncan Campbell, U.S. EPA
Mr. Marc Swientoniowski
Mr. Donald S. Windeler
Robert F. Casselberry, Esq.
Scott R. Dismukes, Esq.

JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

STEVEN E. CHESTER
DIRECTOR

March 29, 2006

Mr. Thomas J. Kevin, Plant Manager
Double Eagle Steel Coating Company
3000 Miller Road
Dearborn, Michigan 48120

Dear Mr. Kevin:

SUBJECT: MID981092190

On February 27, 2006 and March 7, 2006, staff of the Department of Environmental Quality (DEQ), conducted an inspection of Double Eagle Steel Coating Company, (hereafter Facility), located at 3000 Miller Road, Dearborn, Michigan. These inspections were performed to evaluate compliance of the Facility with Part 111, Hazardous Waste Management (Part 111) and Part 121, Liquid Industrial Wastes (Part 121) of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); Subtitle C of the federal Resource Conservation and Recovery Act of 1976, as amended (RCRA); and any administrative rules or regulations promulgated pursuant to these Acts. The March 7, 2006 inspection was performed as a follow-up to the February 27, 2006, United States Environmental Protection Agency (UESPA) led joint-inspection of the facility performed by DEQ staff in conjunction with a representative of Region V of the UESPA.. A copy of the completed DEQ inspection forms can be obtained by contacting this office. USEPA, as the lead agency for establishing the RCRA compliance status of the Facility during the February 27, 2006 inspection, will forward that agency's findings under separate cover and are herein copied on this transmittal.

As a result of the initial and follow-up inspections performed at the Facility, staff of the DEQ has determined that the above Facility is in violation of the following:

1. Rule 299.9302: Rule 299.9307(1): 40 CFR 262.11, 40(c): 40 CFR 268.7(a)(6) & (8): Part 121, Section 12103(1)(a) and (3): the Facility, as a generator of hazardous waste and liquid industrial waste (LIW), is required to characterize that waste in accordance with the requirements of Part 111, Hazardous Waste Management, and rules promulgated under that part, and the requirements of 40 CFR 262, Federal Standards Applicable to Hazardous Waste Generators, and to maintain records of that characterization on-site for a period of three (3) years. Hazardous waste and LIW generated at the facility has been identified to include, but not be limited to: 1) spent caustic process bath stored within a 20,000 gallon "end-of-line" holding tank (Tank 12); 2) spent caustic process bath released from Tank 12 into a secondary containment structure associated with that above ground storage tank; 3) waste water and hydraulic oil stored within two (2) above ground storage tanks (Tanks 43 and 44) located proximate to Tank 12; and 4) filter cake containing free-liquids that is generated from waste water treatment pre-treatment associated with the Facility's zinc and alloy electro-galvanizing process.

Facility personnel indicated to DEQ staff that field characterization of pH levels associated with the spent caustic process bath is performed by on-site Facility laboratory personnel prior to "caustic downturn" extraction from Tank 12 and prior to remedial pumping and transport off-site of the spent caustic bath released into the secondary containment structure associated with Tank 12. Facility personnel were not able to provide to DEQ staff documentation of the recorded pH levels or other characterizations that had been completed on the spent caustic bath for the previous three years. Facility personnel indicated that pH and other characterization records associated with the spent caustic bath have not historically been recorded in the operating record and are thereby not available for DEQ staff review.

In addition, waste characterization associated with filter cake generated from waste water treatment pre-treatment associated with the Facility's zinc and alloy electro-galvanizing process has been historically shown to be hazardous for chromium. More recent waste characterization documentation provided to the DEQ has indicated the waste water pre-treatment filter cake waste stream generated by the zinc and alloy electro-galvanizing process may be, at times, manageable as a non-hazardous LIW. The characterization documentation provided to the DEQ, however, is of insufficient scope and frequency to ensure adequate characterization and management of the filter cake generated at the Facility during the last three years.

Please provide, in response to this letter, updated characterization documentation of all hazardous waste and LIW waste streams generated at the Facility, pursuant to the aforementioned State and Federal requirements, including the spent caustic process bath stored within Tank 12 and released into the associated secondary containment structure, waste water and hydraulic oil stored within Tanks 43 and 44, and filter cake containing free-liquids that is generated from waste water pre-treatment associated with the Facility's zinc and alloy electro-galvanizing process. The characterization of these and other subject hazardous waste and LIW waste streams can be in the form of testing the waste according to methods set forth in Part 111, or by applying knowledge of the hazardous characteristics of the waste in light of the materials or processes used.

Please include, as well, documentation of standard operating practices that have been put in-place or will be implemented to ensure the appropriate characterization and management of all subject hazardous waste and LIW waste streams generated by the Facility. Also included within this response, documentation as to changes in the record keeping procedures implemented by the Facility to ensure that records associated with all appropriate hazardous waste and LIW waste stream characterizations are maintained on-site for review by State and Federal personnel.

2. Rule 299.9306(1)(e) & (f) and 299.9307(1): Part 121, Section 12113(1), (2) & (3): the Facility, as a generator of spent caustic hazardous and LIW, is required to ensure protection of the generated waste streams from the weather, and to ensure protection of those waste streams from release into the soil, surface water or groundwater, drain or sewer, or air. Facility personnel indicated to DEQ and USEPA staff during the initial and follow-up site visits, that standard operating procedures associated with spent caustic process bath stored within Tank 12 includes the periodic release of hazardous waste and LIW spent caustic process bath from Tank 12 into its associated secondary containment structure. Documentation provided to the DEQ indicates that discharge volumes of between 2,500 and 7,500 gallons of spent process bath have historically been released into the secondary containment structure. Documentation provided to the

DEQ indicates that these materials are reportedly discharged into the secondary containment structure on a bi-monthly or more frequent basis.

The Facility, by improperly allowing the release of hazardous waste and LIW entrained with corrosion protection process oil into secondary containment associated with Tank 12, has failed to ensure the protection of characteristic hazardous waste liquids and LIW from weather. Visual inspection of the secondary containment structure found free liquids to be present within that structure, limiting the ability of DEQ staff to make a determination as to whether the secondary containment structure is adequately preventing the release of hazardous waste liquids and LIW from being discharged into the soil, surface water or groundwater, drain or sewer, or air. The continued periodic release of hazardous waste liquids and LIW into the secondary containment structure, and the inability of the Facility to ensure the integrity of the secondary containment structure and Tank 12, is a violation of treatment, storage and disposal requirements associated with these waste streams, and associated or ancillary requirements of Parts 111, 121, 31, and 55 of Act 451.

Please provide, in response to this letter, documentation as to changes that have been implemented, including standard operating procedures initiated or ceased that will ensure the aforementioned illicit discharges of hazardous waste liquids and LIW into the secondary containment structure associated with Tank 12 are discontinued. Also, please provide, in response to this letter, documentation of the remedial actions, repairs, reviews, certifications, etc., that will take place to ensure that integrity of Tank 12 and its associated secondary containment structure, so that the appropriate storage and containment of hazardous waste liquids and LIW can be performed in a manner that will ensure protection from releases of hazardous waste liquids and LIW being discharged into the soil, surface water or groundwater, drain or sewer, or air, as called for within Parts 111, 121, 31, and 55 of Act 451 and associated State, Federal and local regulations and requirements.

3. Part 121, Section 12111(1) and (2): the Facility, as a generator of spent caustic process hazardous waste and LIW, is required to notify the DEQ and other appropriate State, Federal and local agencies of the release incidents that have taken place at the Facility, including the release of hazardous waste liquids and LIW into the secondary containment structure associated with Tank 12. The Facility is also required to prepare and maintain as part of their records a written report documenting incident and response actions taken, including any supporting analytical data. Facility personnel indicated to DEQ and USEPA staff during the initial and follow-up site visits that the Facility has not been reporting historical releases of spent caustic process hazardous waste and LIW to the DEQ and other appropriate State, Federal and local agencies. Facility personnel did not provide to DEQ and USEPA staff records or other written documentation associated with historical release incidents associated with Tank 12, including response actions undertaken by the Facility, and any supporting analytical data.

Please provide, in response to this letter, standard operating procedures that will be put into place to ensure all future release incidents of hazardous waste liquids and LIW into the secondary containment structure associated with Tank 12 will be reported to the appropriate State, Federal and local agencies, and that the Facility will maintain as part of their records a written report documenting incident and response actions taken, including any supporting analytical data.

4. Rule 299.9810(3): Rule 299.9816(2): 40 CFR 279.22(c)(1): the Facility, as a generator of used oil that is stored on-site, is required to label/mark "Used Oil" on all containers storing used oil. Facility personnel described to DEQ and USEPA staff, that the spent caustic process bath stored within Tank 12 includes entrained corrosion protection process oil generated from the pre-treatment cleaning of rolled steel. Tank 12 did not include a "Used Oil" label or marking during the performed initial and follow-up site visits.

   Please provide, in response to this letter, documentation that the appropriate "Used Oil" labeling/marking has been or will be affixed on all containers used to store used oil at the Facility, to include Tank 12 and its associated piping and secondary containment structure.

5. Rule 299.9810(3): Rule 299.9816(2): 40 CFR 279.22(d)(1 & 4): the Facility, as a generator of used oil that is stored on-site, is required to stop releases of used oil and prevent future releases by, if necessary, repairing or replacing any leaking oil containers or tanks. Facility personnel did not indicate to DEQ and USEPA staff that measures have been implemented to halt the periodic releases of oil laden spent caustic process bath stored within Tank 12, nor have they indicated that repairs have been made and/or equipment replaced to ensure future releases of this material does not take place from Tank 12 into its associated secondary containment structure.

   Please provide, in response to this letter, documentation of remedial actions, repairs, reviews, certifications, etc., that will be implemented to ensure the integrity of Tank 12 and its associated secondary containment structure, so that the appropriate storage and containment of hazardous waste liquids and LIW, including used oil, is provided.

In addition to the aforementioned violations that the Facility will be asked to respond to the DEQ directly, DEQ and USEPA staff identified Tank 12 to be a hazardous waste tank that is being operated in violation of State and Federal requirements associated with hazardous waste accumulated in tanks. As mentioned above, the USEPA, as the lead agency in the February 27, 2006 site inspection, will be forwarding under separate cover, that agency's findings on RCRA-related issues associated with Tank 12 and other findings identified during the February 27, 2006 site inspection. A summary of potential RCRA violations identified by DEQ staff are as follows:

- 40 CFR 262.34(a)(3): Failure to label or mark clearly Tank 12 with the words "Hazardous Waste."
- 40 CFR 265.191: Failure to fully assess the integrity of the existing hazardous waste storage tank system, for Tank 12 and its associated secondary containment structure.
- 40 CFR 265.193: Failure to ensure adequate secondary containment, including appropriate coating and structural integrity, for Tank 12, with those conditions being met before January 12, 1990, or when Tank 12 reached 15 years of age, whichever is later.
- 40 CFR 265.194: Failure to initiate controls and practices to prevent spills and overflows from hazardous waste tanks, including the documented overflows of hazardous waste spent caustic process bath from Tank 12.
- 40 CFR 265.195: Failure to inspect daily the condition and various release detection and control components of a hazardous waste tank and its associated secondary containment structure, including those detection and control components associated with Tank 12.

Completed inspections must be able to detect releases from the tank system, including the tank base.

- 40 CFR 265.196: Failure to remove from service immediately a hazardous waste storage tank system or secondary containment system from which there has been a leak, spill or which is otherwise unfit for use (Tank 12).

- 40 CFR 265.202: Failure to manage all hazardous wastes placed in Tank 12 in accordance with the applicable air emission standard requirements of 40 CFR 265, Subparts AA, BB, and CC.

The following comments/issues, which are not specific violations, were identified:

A. As a Large Quantity Generator (LQG) of hazardous waste, the Facility is required to fully establish that the spent caustic process bath, hazardous waste stream stored within Tank 12 is accumulated on-site for 90 days or less or, alternatively, that the Facility is operating as a storage facility subject to the requirements of 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 270, unless the Facility has been granted an extension to the 90-day period. Please provide, in response to this letter, documentation used to establish the on-site storage time associated with spent caustic process bath within Tank 12, and how that relates to the 90-day or less accumulation standard for LQGs.

B. Section 16704 of Public Act 451 requires that used oil be recycled and not disposed of by dumping onto the ground, discharging, dumping, or depositing into sewers, drainage systems, surface waters, groundwaters, or other waters of this state, by incineration, as refuse, or onto any public or private land unless the land is designated by the state or an agency or political subdivision of the state as a collection facility for the disposal, dumping, or deposit of used oil and if the used oil is placed in a receptacle or container installed or located at the collection facility. The Facility is required to fully establish the final disposition of used oil generated by the Facility, including used oil generated from the spent caustic process bath generated by the Facility. Please provide, in response to this letter, documentation used to establish the final disposition of all used oil generated at the Facility, to include corrosion protection process oil entrained within spent caustic process bath within Tank 12, and how the established final disposition of these materials meets the requirements of Section 16704 of Public Act 451.

C. At the time of inspection, it was determined that the Site Identification Verification form on file with our office had not been updated by the Facility to include the appropriate site contact personnel. Please complete and submit an updated form EQP 5150 (enclosed) or go on-line and utilize MITAPS (http://www.mi.gov/mitaps) to include the appropriate form updates, as necessary, and verify this has been done in your response to this letter.

The Facility must respond to the above violations, and is requested to respond to the comments/issues noted in this letter. Please submit documentation to this office regarding those actions taken to address the violations and the comments/issues **by April 28, 2006**. The DEQ will evaluate the response, determine the Facility's compliance status and notify you of this determination.

This letter of warning does not preclude, nor limit, the DEQ's ability to initiate any other enforcement action, under state or federal law, as deemed appropriate.
Enclosed, for your information, are the following handouts: Waste Characterization; Waste Minimization; Used Electric Lamps & Small Ballasts; and Polychlorinated Biphenyls (PCB's) in Florescent Light Fixtures. Pollution Incident Prevention Plan (PIPP) guidance can be viewed at the following website: http://www.deq.state.mi.us/documents/deq-ead-tas-pipp5summary.pdf.

If you have any questions, please feel free to contact me.

Sincerely,

James A. Day
Environmental Quality Analyst
Waste and Hazardous Materials Division
586-753-3835

Enclosures
cc: Mr. Duncan Campbell, USEPA
Mr. Christopher McBee, Double Eagle Steel Coating Company
Mr. Lawrence AuBuchon, DEQ

Exhibit A

CHESTER ENGINEERS

September 15, 1997

Ref. No. 3624-22

Mr. Andrew Yaksic
Environmental Engineer
Double Eagle Steel Coating Co.
3000 Miller Road
Dearborn, Michigan 48120

Dear Mr. Yaksic:

Re: RCRA 40 CFR Subpart J Certification of Aboveground Storage Tank System No. 12 for Hazardous Waste Storage at Double Eagle Steel Coating Co.

On Friday, August 8, 1997, Chester Engineers, Inc. (Chester) performed an inspection of the hazardous waste storage tank system No. 12 at your facility. This tank contains an oily caustic wastewater characterized as D002 hazardous waste due to high pH characteristics.

This inspection was conducted as part of a certification evaluation as required by 40 CFR 265 Subpart J for "existing tanks." An existing tank is one constructed prior to July 14, 1986. Your tank was constructed and put into operation on April 25, 1986 and therefore is defined as an "Existing Tank System" and not a "New Tank System." Chester's certification evaluation, therefore, was conducted following guidelines and regulations required for existing tanks. To the extent possible, the evaluation was performed consistent with the requirements of 40 CFR, Part 265, Subpart J.

This report is the final task in the certification process and will summarize the results of the certification evaluation.

The Tank System No. 12 at Double Eagle was found to be in compliance with all applicable regulations for existing tank systems, and compliance is certified by a Chester professional engineer at the end of this report.

Evaluation Methods

Chester followed the evaluation methods described in the EPA Document titled, "Hazardous Waste Tank Systems Inspection Manual, RCRA Enforcement Division, Office of Waste Programs Enforcement, September 1988" as well as current guidance checklists provided by the Michigan Department of Environmental Quality (MDEQ).

The evaluation was completed by visiting the Double Eagle facility, reviewing waste characterization documentation, tank design and construction documents and drawings,

3830 Packard Road, Suite 120
Ann Arbor, Michigan 48108
313-973-0700; Fax 313-973-2904

interviewing the persons responsible for the tank system, and a physical inspection of the tank system (using state and federal checklists) to determine compliance with the state and federal hazardous waste regulations as they apply to the hazardous waste storage system.

Upon completion of the data gathering and on-site inspection, Chester evaluated all the information gathered.

Description of the Tank System

The No. 12 Tank System includes a vertical, cylindrical, closed top, 20000 gallon tank constructed of steel which is set on a concrete slab. This tank and slab are located inside a secondary containment dike which has inside dimensions measuring approximately 33.5' x 16.5' x 6.75' tall. The tank measures approximately 15 feet in diameter and 17 feet tall. The slab that the tank sets on is four feet tall and constructed of concrete. Inside the secondary containment is also a 5.5 feet diameter centrifuge no longer in operation. The total volume of the containment area (after subtracting the tank slab volume and portion of the centrifuge inside the containment area and adding the volume of the storage tank inside the containment) is approximately 21,900 gallons. This meets the federal requirement that secondary containment hold 100% of the stored volume plus rainfall.

The secondary containment was constructed of 12" thick concrete walls and floor and coated with a 60 mil composite liner of fiberglass, resin and silica which is compatible with the waste stored.

Discussion of Results

The checklist provided by the State of Michigan that was used during this certification evaluation is attached to this document, as well as the relevant federal checklist. (included as Attachments A and B). It is important to note that this is an existing tank system, and was not required to be built with secondary containment. Even though none was required, Double Eagle did construct secondary containment around tank No. 12 when initially built. This system, therefore, is an "upgraded existing tank system" and, therefore, did not require annual tightness testing or the initial certification of installation by a professional engineer. The checklists used reflect the requirements and exemptions for an upgraded existing tank system.

From the field measurements, calculations were completed, verifying sufficient secondary containment is present. These calculations are included as Attachment C as well as an example of the daily tank system checklist that is used to meet regulatory inspection requirements.

The waste stored in the tank is classified as a D002 hazardous waste due to it's high pH. The waste is an oily, caustic wastewater. It is not ignitable or reactive. Manifests indicated that the tank was emptied within the previous week and that approximately 4-5 truck loads per week are shipped out of this tank. Therefore, the 90 day maximum storage time has not been exceeded.

It was confirmed through a review of waste documents and interviews that only the one waste stream (oily wastewater) is stored in this tank. No other hazardous wastes of concern are stored at this facility, therefore there are no waste compatibility issues. The tank includes a waste level indicator which is monitored at the wastewater treatment plant operator's control computer and includes a high level alarm. Daily inspection is conducted and documented to check for spills, physical condition of the tank and containment, pumps, piping, and level gauge and alarm. An example of the daily inspection sheet is attached. The tank and containment foundation was found to be adequate due to no signs of settling or cracking since it's construction approximately 11 years ago. Auxiliary equipment meets the secondary containment requirements in 40 CFR 265 Subpart J.

Certification

Based upon the visual inspection of system components, review of documents provided by Double Eagle, interviews with system managers, and being familiar with 40 CFR 265 Subpart J, I certify that, to the best of my knowledge, the D002 wastewater transfer and storage system is in compliance with good engineering practices, and meets the requirements of the relevant state and federal regulations regarding upgraded existing hazardous waste storage tank systems. No major system design or construction errors were identified during this evaluation. Further the system includes sufficient secondary containment, early warning systems, and spill prevention measures to safeguard against release of D002 fluids to the environment.

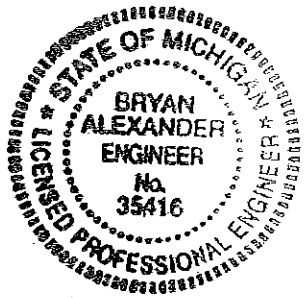
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance a with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my

inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If there are any questions or comments regarding this evaluation and certification please contact me at (313) 973-0700.

Sincerely,

Bryan Alexander, P.E., CHMM
Senior Project Manager
Ann Arbor Regional Office



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ATTACHMENT A

FEDERAL CHECKLIST

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

BRYAN ALEXANDER
Inspector Name

CHESTER ENGINEERS
Address (Region)

(313) 973-0700 x 1126
Telephone Number

AUG 8, 1997
Date of Inspection

Facility Identification

A.1 DOUBLE EAGLE STEEL COATING CO.
Facility Name

B.1 300 MILLER RD.
Facility Address

B.2 DEARBORN
City

B.3 MICHIGAN
State

B.4 48120
Zip

B.5 N/A
Mailing Address (if different)

B.6 WAYNE
County

C.1 STEEL GALVANIZING
Nature of business; identification of operations

D.1 MID 981092190
EPA I.D. Number

E.1 ANDREW YAKSIC
Facility Contact

E.2 ENVIRONMENTAL ENGINEER
Job Title

E.3 (313) 203-9829
Contact Work Phone

F.1 Identification of Hazardous Waste Tank Systems at this Facility

TANK SYSTEM # 12 - D002, OILY CAUSTIC WASTEWATER, TANK IS 20,000 GAL, VERT., CYLINDRICAL TANK (15' ϕ x 17' TALL)

DOUBLE EAGLE TANK SYSTEM # 12

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

I. Small Quantity Generators - Compliance with § 255.201 N/A

A.1 _____ A.2 _____
Tank volume (gallons) Tank description (e.g. aboveground, steel, lined)

A.3 _____
Tank location (e.g. inside on cement floor, outside on asphalt pad)

B.1 Material Stored: Be as specific as possible(e.g., 20% Methylene chloride, 30% 1,1,1-trichloroethane, 50% mineral spirits)

_____ _____
Hazardous waste no. Description

B.2 Does this tank ever contain waste other than the above? _____ yes _____ no

If so, list other waste:

EPA Hazardous Waste Number	Waste Description

B.3 Are hazardous wastes placed in tanks that are compatible with the waste so that the tank or inner liner may not fail prematurely? _____ yes _____ no

C.1 Are wastes being stored in tanks for greater than 180 days? _____ yes _____ no

C.2 Is the disposal site greater than 200 miles away? _____ yes _____ no

C.3 Are wastes being stored in tanks for greater than 270 days? _____ yes _____ no

C.4 SQG, who store waste greater than 180 days (270 days if shipped over 200 miles) or who exceed the 6,000 kg limit. Has the owner/operator applied for an operating permit? _____ yes _____ no

Facility Id. DOUBLE EAGLE Tank System Id. #12

I. Small Quantity Generators - Compliance with § 265.201 N/A

C.5 Does the owner/operator inspect the tank system routinely for the following:

Discharge control equipment each operating day	yes	no
Data from monitoring equipment (e.g. gauges) each operating day	yes	no
Level of waste in tank each operating day	yes	no
Materials for signs of corrosion weekly	yes	no
Area around tank for spills or leaks weekly	yes	no

D. Special wastes

D.1 Is the owner/operator storing ignitable or reactive wastes so that it does not generate heat, fire, violent reactions, gases that are flammable, toxic dusts, or other means to threaten human health?

yes no NA

D.2 Does the owner/operator follow appropriate procedures for reactive of ignitable wastes? (See Special Wastes, Checklist VI)

yes no NA

E.1 Is the tank labeled 'Hazardous waste"?

yes no

E.2 Tank Condition - Indicate presence of any of the following

discolored paint or rust anywhere on tank system	yes	no
blister, cracks, bulges or other signs of potential failure	yes	no
worn hoses, rips in liners,	yes	no

E.3 Does the area around the tank show any evidence of spills (e.g. discoloration, dead vegetation)?

yes no

E.4 Are uncovered tanks operating with a minimum of 2 feet (60 cm) freeboard or are they equipped with containment structure?

NA yes no

Facility Id. DOUBLE EAGLE Tank System Id. # 12

N/A

E. Small Quantity Generators - Compliance with § 265.201

E.5 In tanks with a continuous feed systems, is the system equipped with a cut-off or by-pass system? NA ____ yes ____ no ____

F. Preparedness and Prevention Plan Compliance

F.1 Is there an emergency response plan? ____ yes ____ no

F.1 Internal communication or alarm system available ____ yes ____ no

F.2 Is telephone or other device capable of summoning emergency assistance from local police, fire or other emergency response teams available? ____ yes ____ no

F.3 Are portable fire extinguishers and spill control equipment available and in operational condition? ____ yes ____ no

F.4 Water available to supply water hose streams ____ yes ____ no

Facility Id. MID 981092190 DOUBLE ENDED TANK SYSTEM #12

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

II. Documentation of General Inspection Requirements under §264.195, 265.195

A.1 Inspection plan/procedures adequately thorough in order to identify problem areas and small leaks

X yes ____ no

A.2 Documented inspection as scheduled in permit (< 90 DAY STORAGE for overfill controls

____ yes ____ no X N/A

A.2a Interim status and 90-day accumulation tank systems must have the overfill controls inspected (and documented) each operating day

X yes ____ no ____ N/A

A.3 Documented daily inspection of aboveground portions of tank system

X yes ____ no

A.3a Use of inspection devices

____ yes X no VISUAL & SMELL provide name of device used

A.4 Documented daily inspection of monitoring and leak inspection data

X yes ____ no

A.5 Documented daily inspection of construction materials of both tank system and secondary containment, and inspection of tank location and secondary containment for signs of erosion or releases

X yes ____ no

A.6 Confirmation of proper operation of the cathodic protection system within six months of initial installation

____ yes ____ no X N/A

date of installation ____ date of inspection ____

A.6a Annual inspection of cathodic protection after installation

____ yes ____ no X N/A

A.7 Bimonthly inspection of all sources of impressed current

____ yes ____ no X N/A

A.7a Method used to inspect impressed-current system N/A

Facility Id. DOUBLE EAGLE Tank System Id. #12, D002

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

III. Existing Tank Systems - Compliance with § 264.191, 265.191

A.1 20,000 Tank volume (gallons)

A.2 ABOVE GROUND, CYLINDRICAL, VERTICAL Tank type (above-,on-,in-,below ground)

B.1 Material Stored: Be as specific as possible (e.g., 20% Methylene chloride, 30% 1,1,-trichloroethane, 50% mineral spirits)

EPA Hazardous Waste Number	Waste Description
D002	OILY, CAUSTIC WASTEWATER

C. Secondary containment

C.1 Does this tank system have secondary containment? X yes ___ no

If yes, see Checklist IV, if no continue below

C.2 Has facility been granted a variance from secondary containment? N/A ___ yes ___ no

C.3 Is a written assessment of tank system integrity on file? N/A ___ yes ___ no

C.4 If assessment is provided, has it been reviewed and certified by a registered, professional engineer? N/A ___ yes ___ no

C.5 APRIL 25, 1986 Tank Age C.5a Documented X yes ___ no

C.6 APRIL 25, 1986 Facility Age C.6a Documented X yes ___ no

C.7 IN PLACE Date when secondary containment is required

DOUBLE EAGLE TANK SYSTEM #12

III. Existing Tank Systems - Compliance with § 264.191, 265.191

D. Design standards

D.1 The tank is constructed with: (be as specific as possible e.g. fiberglass-reinforced plastic, mild steel, nickel based alloy).
MILD STEEL

D.2 Document evaluates tank system in accordance with the most recent applicable design standards — yes: ____ no: X ①

D.3 Is tank material generally compatible with waste? (VISUAL OBSERVATION OF INSIDE WALLS INDICATE NO CORROSION) — yes: X no: ____

① VISUAL INSPECTION INDICATES GOOD ENG. PRACTICE & NO PROBLEMS

E. Corrosion protection measures (applicable to tank systems with metal components in contact with soil or water)

E.1 Document describes existing corrosion protection measures? N/A — yes: ____ no: ____

E.2 Type of systen employed (Coatings, Wraps, Electrical isolation devices, Sacrificial-anode, Impressed-current) N/A

F. Non-enterable, underground tanks N/A

F.1a Method of leak testing used ____

F.1b Verification of annual testing — yes: ____ no: ____

F.1c Tank found to be tight — yes: ____ no: ____

F.1d Leak testing device accounts for following changes:

Temperature — yes: ____ no: ____

High water table — yes: ____ no: ____

Tank end deflection — yes: ____ no: ____

Vapor pockets — yes: ____ no: ____

G. Other tank types

G.1a Method of leak testing used ____

G.1b Verification of annual testing — yes: ____ no: ____

G.1c Tank found to be tight — yes: ____ no: ____

DOUBLE EAGLE TANK SYSTEM # 12

III

III. Existing Tank Systems - Compliance with § 264.191, 265.191 N/A

G.2 Internal inspections

G.2a Certification by registered, professional engineer ____ yes ____ no

G.2b Has the engineer checked and documented inspection of all appropriate factors? ____ yes ____ no

H. Tank ancillary equipment

H.1 Feed systems, Safety cutoff and/or bypass systems, pressure controls are described in written assessment ____ yes ____ no

H.2 Has ancillary equipment been leak tested or undergone other approved integrity assessment annually? ____ yes ____ no

H.3 Method of leak testing used _____

H.4 Have any of the leak tested tank system components been found to be leaking or unfit? ____ yes ____ no

If any of the tanks system components have failed the examinations or leak tests, Release Response Checklist VI should be included for this tank system.

Facility Id. DOUBLE EAGLE Tank System Id. #12

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

IV. New Tank Systems - Compliance with §264.192 SEE SECTION III

A. New Tank design

A.1 _____ Tank volume (gallons)

A.2 _____ Tank type(above-,on-,in-,below ground

A.3 _____ Tank Dimensions

A.4 _____ Tank shape (spherical, cylindrical,etc

A.5 The tank is constructed with: (be as specific as possible e.g. fiberglass-reinforced plastic, mild steel, nickel based alloy)

_____

B. Material Stored: Be as specific as possible e.g. (20% Methylene chloride, 30% 1,1,-trichloroethane, 50% mineral spirits)

EPA Hazardous Waste Number	Waste Description

C. Tank System Installation

C.1 Certification of inspection and supervision of installation and design by independent installation expert or qualified engineer N/A yes _____ no

C.2 Did the inspection include the following: N/A

Weld breaks _____
Punctures _____
Scrapes on protective coating _____
Cracks _____
Corrosion _____
Other damage or inadequate construction _____

C.3 Has a detailed description of the installation been provided? N/A yes _____ no

C.4 Has the tank passed a test for tightness prior to being covered or placed in use? N/A yes _____ no

DOUBLE EAGLE TANK SYSTEM #12

IV

IV. New Tank Systems

C.5 Has the ancillary equipment (e.g. piping) passed a test for tightness? N/A — yes ____ no ____

C.6 Has a detailed description of the tightness testing been provided? N/A — yes ____ no ____

D. Secondary containment - Compliance with §264.193

D.1 Has the facility been granted a variance? If yes, go to Section F on this checklist. yes ____ no X

D.2 Is secondary containment for new tanks and ancillary equipment installed? yes X no ____

D.3 Secondary containment is: (circle one) liner, (vault), double-walled component

D.4 Secondary containment materials are CONCRETE DIKE W/FIBERGLASS COATING

D.5 Type of leak detection equipment employed VISUAL DAILY INSPECTION

D.6 Record of leak detection operation available? yes X no ____

D.7 Have any leaks from the primary system into secondary containment been detected? yes X no ____

D.8 Was leaked waste removed from the secondary containment system within 24 hours? yes X no ____

D.9 Was the repair to the primary system documented prior to returning tank into service? yes X no ____

E. Exemption of secondary containment for tank systems or component §264.193(f)

E.1 Is all aboveground, straight piping that is not covered by secondary containment inspected daily? yes X no ____

E.2 Are all welded flanges, welded joints, and welded connections inspected for leaks daily? yes X no ____

E.3 Are all sealless or magnetic coupling pumps visually inspected for leaks daily? N/A — yes ____ no ____

E.4 Are all pressurized, aboveground piping systems with automatic shutoff devices visually inspected for leaks daily? yes X no ____

IV. New Tank Systems

F. External Corrosion Protection for metal components or equipment §264.192 N/A

F.1 Has a corrosion potential assessment been prepared by a corrosion expert? N/A _____ yes _____ no

F.2 Type of corrosion protection installed N/A (coatings, wraps, electrical isolation devices, sacrificial-anode, impressed-current)

F.3 Has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathotic-protection devices) N/A _____ yes _____ no

If any of the tank system components have failed tightness testing or have resulted in leaks that had releases outside the secondary containment, Release Response Checklist VI should be included for this tank system.

ONE RELEASE OF WATER FROM SECONDARY CONTAINMENT IN JUNE 1997.

Facility Id. DOUBLE EAGLE Tank System Id. # 12

V

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

V. Tank Systems that Store or Treat Ignitable or Reactive Wastes N/A

Compliance with § 264.198

A. Special Requirements for ignitable or reactive wastes

A.1 Has waste been treated, mixed or otherwise rendered nonreactive or not ignitable (except in emergency conditions) so that the mixture is no longer ignitable or reactive?

_____ yes _____ no

A.2 Has complete chemical identification of waste compatibility been determined prior to mixing of wastes?

_____ yes _____ no

A.3 Is the tank protected from conditions that may cause it to ignite (e.g. use of spark proof tools) or protected from contact with materials that may cause it to react?

_____ yes _____ no

A.4 Is the required National Fire Protection Association distance between waste management area (ignitable wastes) and public ways and adjoining properties maintained?

_____ yes _____ no

A.5 Has an appropriate method of tank system decontamination been selected based on the type of waste residues remaining in a receiving vessel?

_____ yes _____ no

Facility Id. DOUBLE EAGLE Tank System Id. # 12

HAZARDOUS WASTE TANK INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

VI. Release Response - Compliance with § 264.196

A.1 Notification of releases to Regional Administrator (from file review)
date: JUNE 97 description: RAINWATER IN SECONDARY CONTAINMENT

A.1a Did the O/O report to the Regional Administrator within 30 days of each release with the following information
- likely route of migration of release
- characteristics of surrounding soil
- results of sampling
- proximity to downgradient drinking water, surface water and population
- description of response actions planned or taken

X yes ____ no ____ N/A

* PHONE CALL TO DON NEWSOME @ MDEQ / SWD ON 6-19-97

A.2 Did the O/O immediately remove the tank component from service after spill/leak?

X yes ____ no ____ not able to verify ____ N/A

A.3 Was waste removed from leaking component of the tank system and from secondary containment?

X yes ____ no ____ N/A

A.4 Were visible releases to the environment contained?

X yes ____ no ____ N/A

A.5 Has secondary containment, repair, or closure of the tank system been provided?

X (REPAIR) yes ____ no ____ N/A

A.6 Was the repair certified by an independent, qualified, registered, professional engineer?

X yes ____ no ____ N/A

(AS PART OF THIS EVALUATION)

VII

Facility Id. DOUBLE EAGLE Tank System Id. # 12

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

VII. Visual Tank System Inspection General Operating Requirements §264.194

A. Aboveground Portions § 264, 265.194(a)

A.1 Metal Tanks -

Look for:	Indicate Presence
Gross leakage,	NO
Major corroded areas	NO
Deterioration (e.g blisters)	NO
Discolored paint	NO
Cracks (nozzle connections, in welded seams, under rivets)	NO
Buckles and bulges	NO
Defective manhead gaskets	NO
Corrosion of tank tops or roofs	NO
Corrosion around nozzles and valves	NO
Erosion around foundation, pads and secondary containment	NO
Cracks in concrete curbing and ringwalls	NO
Rotting of wooden supports	NO (N/A)
Welds and anchor bolts between tank bottoms and ringwalls	OK
Deterioration of protective coatings such as discoloration and film lifting	NO

A.2 Fiberglass-Reinforced Plastic Tanks - N/A

Look for:	
Gross leakage	
Bending, curving or flexing	
Longitudinal cracks in horizontal tanks,	
Vertical cracks in vertical tanks	

V

Facility Id. DOUBLE EAGLE Tank System Id. # 12

VII. Visual Tank System Inspection

A.3 Concrete Tanks - Above Ground Portions N/A

Look for:	Indicated Presence
Gross leakage	
Cracks	
Porous areas permeable to liquid (wet spots)	
Deterioration of protective coatings such as discoloration and film lifting	

B. Underground tanks §254.192 N/A

		yes	no	NA
B.1	Is the (new) tank protected from vehicular traffic (paving over tanks should extend at least 1 ft beyond perimeter in all directions)			
B.2	If the backfill is not covered, is it porous and homogeneous?			
B.3	Is there water pooling or depressions in the area of the tank?			

C. Spill and Overfill Prevention Measures §254.194

		yes	no
C.1	Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use?		X
C.1a	Is there any evidence of spillage from disconnect or uncoupling operations		X
C.2	Are overfill prevention controls (e.g. level sensing devices, high level alarms) present and operational?	X	
C.3	Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation?	N/A	
C.4	Is there any evidence of overtopping or major spills		X

VII

Facility Id. DOUBLE EAGLE Tank System Id. # 12

VII. Visual Tank System Inspection

D. Inspection of Ancillary Systems § 264.194

D.1 Inspect piping for the following:	Indicate Presence
Pipe bends, elbows, tees, and other restrictions for leaks, external corrosion and rust spots	NO
Deterioration (e.g blisters) and discolored paint	NO
Orifice plates deteriorated	NO
Throttle valves w/broken stems, missing handles	NO
Wear and tear in flexible hoses	NO
Traffic passing over hoses	NO
Vibration or swaying of pipe systems while pumping	NO

D.2 Inspect pumps and compressors for the following:	Indicate Presence
Foundation cracks	NO
Excessive vibration or cavitation of pumps	NO
Leaky pump seals	NO
Missing anchor bolts	NO
Excessive dirt, burning odors or smoke	NO
Depleted lubrication oil reservior in compressor	NO

D.3 Inspect heat exchangers and vapor control systems for:	Indicate Presence
rust spots or blisters	N/A

E. Auxillary systems for permitted tanks §270.16 N/A

Is the following equipment the same as specified on permit and is it operational?

E.1 Level Sensor _____ Identification	yes	no
E.2 Alarm System _____ Identification	yes	no
E.3 Spill proof couplings, entry points _____ Ident.	yes	no
E.4 Safety Cutoff or Bypass System	yes	no
E.5 Pressure controls (vents)	yes	no

Facility Id. DOUBLE EAGLE Tank System Id. # 12

V

VII. Visual Tank System Inspection

F. Secondary Containment § 264.193

		yes	no
F.1	Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundary plus a 25 yr-24 hr rainfall?	X	
F.2	Is water collected in secondary containment system?		X
F.3	Does any water in secondary containment system appear discolored or otherwise contaminated or is there evidence of waste within the containment system?		X
F.4	Double-walled tanks: §264.193(e)(3)	N/A	
F.4a	If metal, is there appropriate corrosion protection for the outer shell?	N/A	
F.4b	Does it have an operational, built-in continuous leak-detection system?	N/A	
F.5	Vaults:§ 264.193(e)(2)		
F.5a	Does all concrete, including sumps, have liners or coatings?	X	
F.5b	Is a vault constructed with chemically resistant water stops at all joints?	X	
F.5c	Is there deterioration of protective coatings such as discoloration and film lifting?		X
F.5d	Are there any cracks visable in the concrete?		X
F.6	Liners: § 264.193(e)(1)		
F.6a	Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes?	X	
F.6b	If clay liners, do liners show signs of drying and cracking ?	N/A	
F.6c	If polymeric liners, do liners show signs of punctures deterioration due to sun light, chemical spills, rips, tears, gaps, or cracks?		X
F.6d	If a concrete liner, is there any deterioration of its protective coating?	N/A	X

Facility Id. DOUBLE EAGLE Tank System Id. # 12

VII. Visual Tank System Inspection

G. Corrosion Control (metal tank and metal components in-on-or underground)

		yes	no
G.1	Presence of trapped water near tank system (If underground tank system, is water pooling in area above tank location?)		X
G.2	The use of dry, crushed rock or gravel as backfill material		X
G.3	Existence of nearby visible metal structures	X	
G.4	Coatings or wraps		
G.4a	Is the coverage complete?	X	
G.4b	Has the cover or wrap dried, cracked or dissolved?		X
G.4c	Has the coating or wrap been damaged by spills?		X
G.5	Electrical isolation devices	N/A	
G.5a	Are they adequate depending upon the number of nearby, underground metal structures?		
G.5b	Are the devices damaged in any way?	N/A	
G.6	Sacrificial-anode system		
G.6a	How long has it been in place?	N/A	
G.6b	Have the anodes decreased significantly in size?	N/A	
G.6c	Is the sacrificial-anode system damaged?	N/A	
G.7	Impressed-current system		
G.7a	How long has it been in place?	N/A	
G.7b	Have the current requirements changed over time?	N/A	
G.7c	Is the impressed-current system damaged?	N/A	
G.7d	Is the impressed-current system properly maintained?	N/A	

Facility Id. DOUBLE EAGLE Tank Id. # 12 VII

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Inspection Checklist

VIII. Closure, Post-closure Care - Compliance with § 264.197 N/A

A. Tank Systems with Secondary Containment - § 264.197(a) (clean closure)

A.1 Visual verification of clean closure ____ yes ____ no ____ NA

	indicate if done
Tank system materials removed	____
Verification of proper disposal of contaminated equipment	____
Contaminated soils and residues disposed or treated properly	____

B. Tank systems that cannot be practicably decontaminated - § 264.197(b)

B.1 Has the owner/operator demonstrated satisfactorily that all contaminated soils cannot be removed?

____ yes ____ no ____ NA

B.2 Closure of tank site meeting § 264.310 landfill requirements

B.2a Does contaminated area have appropriate final cover?

____ yes ____ no

B.2b Is owner/operator maintaining cover integrity ?

____ yes ____ no

B.2c Is O/O monitoring ground water according to Subpart F?

____ yes ____ no

C. Tank Systems without Secondary Containment - § 264.197(c)

C.1 Has O/O prepared a closure plan for §264.197(a) and a contingency plan for §264.197(b) which were submitted to EPA?

____ yes ____ no

C.2 If the closure plans have not been submitted, are they on file at they facility?

____ yes ____ no

C.3 Is or has the facility closed this tank system at the present time?

____ yes ____ no

If yes, evaluate closure with appropriate evaluation in A or B above.

Facility Id. DOUBLE EAGLE
SYSTEM #12

HAZARDOUS WASTE TANK SYSTEM INSPECTION GUIDANCE

Hazardous Waste Tank System Post-Inspection Form

1. If existing tank systems are present, when is secondary containment required?

Tank Id.	Date Secondary Containment is Required
#12	CURRENTLY CONTAINED

2. Description of Violation / Regulation Violated / Tank System or Component

a. NONE

b.

c.

d.

e.

3. Potential Problems

N/A

If the facility if applying for a permit, inspector should refer comments to permit writer. For all other facilities, inspector should discuss potential problems with owner/operator.

4. Enforcement Action Recommended N/A

ATTACHMENT B

STATE CHECKLIST

GENERATOR TANK SYSTEM INSPECTION FORM

Part 3 Rule

Facility's Name DOUBLE EAGLE STEEL COATING CO.

1994 PA 45

8-8-97 ID# MID 981092190

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected, N/A - Not Applicable

		YES	NO	NI	N/A
ALL TANK SYSTEMS ACCUMULATION TIME (Rule 306: 40 CFR 262.34)					
1. Has more than 90 days elapsed since the tank was emptied? (If yes, operating license needed as required in Part 5 of Rules.) (Rule 306(1): 40 CFR 262.34(a))	GTR		X	NI	N/A
2. Is each tank labeled or marked with the words "Hazardous Waste?" (Rule 306(1)(c): 40 CFR 262.34(a)(3))	GTR	X		NI	N/A
Rule 306(1)(a)(ii) & 40 CFR 262.34(a)(1)(ii) refer to 265 Subpart J, except 265.197° and 265.200 and Rule 615, except Subrule (1).					
GENERAL OPERATING REQUIREMENTS (265.194)					
3. Could wastes placed in the tank system cause ruptures, leaks corrosion or other failure? (265.194(a))	GTR		X	NI	N/A
4. Controls and practices to prevent spills and overflows must include: (265.194(b))				NI	N/A
a) Spill prevention controls. (265.194(b)(1))	GTR	X		NI	N/A
b) Overfill prevention controls. (265.194(b)(2)	GTR	X		NI	N/A
c) Freeboard in uncovered tanks to stop overtopping by wave or wind action or precipitation. (265.194(b)(3))	GTR	[ ]		NI	(N/A)
NOTE: Response to leaks, spills and disposition of leaking or unfit-for-use tank systems is in 40 CFR 265.196.					
5. A tank system or secondary containment system from which there has been a leak, spill or which is unfit for use, was it:				NI	N/A
a) Removed from service immediately? (265.196) REPAIRED CONTAINMENT AND	GTR	X		NI	N/A
b) Completed requirements in 265.196(a-f). PLACED BACK IN SERVICE	GTR	X		NI	N/A
INSPECTIONS (265.195)					
6. Where present, has the facility inspected at least once each operating day. (265.195(a))					
a) Discharge, overflow/spill control equipment (daily). (265.195(a)(1))	GTR	X		NI	N/A
b) Monitoring equipment data (daily). (265.195(a)(3))	GTR	X		NI	N/A
c) Above ground portion of tank system (daily). (265.195(a)(2))	GTR	X		NI	N/A
d) Materials and area around tank (daily). (265.195(a)(4))	GTR	X		NI	N/A
e) Are the inspections documented? (265.195(c))	GTR	X		NI	N/A
7. Must inspect cathodic protection system, if present, for in-ground tanks:					
a) Cathodic protection within six months after initial installation (annually thereafter). (265.195(b)(1))	GTR	[ ]		NI	(N/A)
b) Impressed current inspected and/or tested at least bimonthly. (265.195(b)(2))	GTR	[ ]		NI	(N/A)
c) Are the inspections documented? (265.195(c))	GTR	[ ]		NI	(N/A)
SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE (265.198)					
8. Ignitable or reactive waste must not be placed in tanks unless:					
a) Treated/mixed before or immediately after placed in the tank system, so: (265.198(a)(1)					
i) Resulting mixture is no longer ignitable/reactive. (265.198(a)(1)(i))	GTR	[ ]		NI	(N/A)

AND

		YES	NO	NI	N/A
ii) Does not cause environmental or structural damage to tank systems. (265.198(a)(1)(ii))	GTR	[ ]		NI	N/A
OR					
b) Waste stored/treated so protected from igniting or reacting. (265.198(a)(2))	GTR	[ ]		NI	N/A
OR					
c) Tank system is used solely for emergency. (265.198(a)(3))	GTR	[ ]		NI	N/A
9. Observed National Fire Protection Association's buffer zone for tanks w/ ignitable or reactive wastes? (265.198(b))	GTR	[ ]		NI	N/A
(See tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)					
10. Is the tank system designed, constructed, operated and maintained in conformance with the requirements of Act 207, Michigan flammable liquid regulations. (Rule 615)(4))	GTR	company said: [ ]		NI	N/A
11. Is the tank labeled in accordance with NFPA standard no. 704? (Rule 615(5))	GTR	[ ]		NI	N/A

INCOMPATIBLE WASTE (265.199)

12. Are incompatible wastes stored in separate tanks? (265.199(a)) (If not, the provisions of 265.17(b) apply.)	GTR	[X]		NI	N/A
13. Tank decontaminated before hazardous waste placed in it that held incompatible waste, unless 265.17(b). (265.199(b))	GTR	[ ]		NI	N/A

CLOSURE AND POST-CLOSURE (265.197)

NOTE: At tank system closure refer to 265.197 for closure/post closure care, except 265.197(c).

14. If the tank system is closed, did the facility follow the requirements in 265.197? (265.197)	GTR	[ ]		NI	N/A

EXISTING TANK SYSTEMS

REQUIREMENTS FOR EXISTING TANK(S) CONTAINING LIQUID WASTE THAT DO NOT MEET THE REQUIREMENTS OF 265.193 (R 299.9615)

15. Are above ground tanks:					
a) Paved, diked or curbed or otherwise enclosed to contain not less than 100% of the largest tank. (Rule 615(2)(a))	GTR	[X]		NI	N/A
b) Incompatible waste or interconnected tanks must have 100% containment for each tank. (Rule 615(2)(a))	GTR	[X]		NI	N/A
16. Do underground tank(s):					
a) Have secondary containment and a leachate withdrawal system. (Rule 615(2)(b)(I))	GTR	[ ]		NI	N/A
b) Complete an inventory of wastes not less than twice a month. (Rule 615(2)(b)(ii))	GTR	[ ]		NI	N/A
c) Leachate sampling analysis at least once per year (if b shows loss: sample w/in 24 hours). (Rule 615(2)(b)(iii))	GTR	[ ]		NI	N/A

NOTE: If existing tanks do not have secondary containment meeting RCRA, the facility must assess the existing tank system's integrity, 265.191.
NOTE: The determination that secondary containment does or does not meet the standards in 265.193 can be made by the company. It does not require a certification by an independent engineer.
NOTE: Tanks w/out free liquids in a building w/ impermeable floor & tanks part of secondary containment system are exempt (265.190(a)&(b)).

ASSESSMENT OF EXISTING TANK SYSTEM'S INTEGRITY (265.191)

17. Existing tank system (before 7/14/86) does not meet the secondary containment requirements in 265.193 was an assessment made and certified by an independent engineer? (265.191) MEETS 2nd party cont. req.	GTR	[ ]		NI	N/A

	YES	NO	NI	N/A

CONTAINMENT AND DETECTION OF RELEASES (265.193)

18. Until an existing tank is upgraded to meet the secondary containment requirement in 265.193, has the facility: (265.193(f))			
a) Non-enterable underground tank, did leak test meeting requirement of 265.191(b)(5) annually: (264.193(f)(1))	GTR	[ ]	NI (N/A)
b) For other than non-enterable underground tanks and ancillary equipment the facility must:			
i) Conduct an annual leak test that meets the requirements of 265.191(b)(5). (265.193(f)(2))	GTR	[ ]	NI (N/A)
OR			
ii) An internal inspection or other tank integrity examination by an independent, qualified, registered professional engineer. (265.193(f)(2))	GTR	[ ]	NI (N/A)
19. Secondary containment and detection that meets the requirements, must be provided for: (265.193(a))			
a) New tank systems prior to being put into service (any tank installed after 7-14-86). (265.193(a)(1))	GTR		(N/A)
b) Existing tanks used for F020, F021, F022, F023, F026, F027 prior to 1/12/90. (265.193(a)(2))	GTR		(N/A)
c) Existing tanks w/ documentable age before 1/12/90 or tanks 15 years of age, whichever is later. (265.193(a)(3))	GTR	(YES)	N/A
d) Existing tank system, w/out documented age, upgrades done by 1/12/96 unless facility is greater then 7 yrs in 1988, then containment provided before facility reaches 15 years or by 1/12/90, whichever is later. (265.193(a)(4))	GTR		(N/A)
e) Wastes which became hazardous waste after 1/12/87. (265.193(a)(5))	GTR		(N/A)

NEW TANK SYSTEMS AND UPGRADED EXISTING TANK SYSTEMS

20. Secondary containment and detection systems must have the following: (265.193(c))			
a) Tank system constructed of compatible material with sufficient strength. (265.193(c)(1))	GTR	X	NI N/A
b) Adequate foundation/base. (265.193(c)(2))	GTR	X	N/A
c) Leak detection system designed/operated to detect leaks w/in 24 hours or earliest practical time. (265.193(c)(3))	GTR	X	NI N/A
d) Sloped/drained & all liquid (leaks, precipitation) removed w/in 24 hours or in a timely manner. (265.193(c)(4))	GTR	X	NI N/A
e) Must include one or more of the following:			
i) A liner (external to tanks) and must satisfy the following requirements. (265.193(d)(1))			
A) 100% capacity of largest tank within its boundary. (265.193(e)(1)(i))	GTR	X	NI N/A
B) Prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(1)(ii))	GTR	X	NI N/A
C) Free of cracks or gaps. (265.193(e)(1)(iii))	GTR	X	NI N/A
D) Cover any area waste may come in contact with if released. (265.193(e)(1)(iv))	GTR	[ ]	NI (N/A)

NOTE: If liner is cement then must have, in addition, 265.193(e)(2)(iii & iv)

CEMENT LINERS ONLY

B) Constructed with chemical resistant water stops in place at all joints. (265.193(e)(2)(iii))	GTR	X	NI N/A
F) Impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GTR	X	NI N/A
ii) Vault systems must satisfy the following requirements. (265.193(e)(2)(i-iv))			
A) 100% capacity of the largest tank within its boundary. (265.193(e)(2)(i))	GTR	X	NI N/A
B) Prevent run-on or infiltration of precipitation unless excess of capacity. (265.193(e)(2)(ii))	GTR	X	NI N/A
C) Constructed with chemical resistant water stops in place at all joints. (265.193(e)(2)(iii))	GTR	X	NI N/A

		YES	NO	NI	N/A
D) Impermeable, compatible interior lining or coating. (265.193(e)(2)(iv))	GTR	[X]		NI	N/A
E) If ignitable or reactive, then provide against vapor formation and ignition. (265.193(e)(2)(v))	GTR	[ ]		NI	(N/A)
F) Provide with exterior moisture barrier. (265.193(e)(2)(vi))	GTR	[ ]		NI	(N/A)
iii) Double wall tanks must satisfy the following requirements. (265.193(d)(3))					
A) Designed as integral structure. (265.193(e)(3)(i))	GTR	[ ]		NI	(N/A)
B) Protect metal surface for corrosion. (265.193(e)(3)(ii))	GTR	[ ]		NI	(N/A)
C) Capable of detecting releases within 24 hours. (265.193(e)(3)(iii))	GTR	[ ]		NI	(N/A)
f) Ancillary equipment (note certain exclusions) must be provided with full secondary containment. (265.193)(f))	GTR	[X]		NI	N/A

NEW TANK SYSTEMS
DESIGN AND INSTALLATION OF NEW TANK SYSTEMS OR COMPONENTS (265.192)

21. Facility obtain written assessment that was reviewed & certified (270.11(d)) by an independent, qualified, registered professional engineer:					
a) Design standards and considerations? (265.192(a)(1)&(5))	GTR	[ ]		NI	(N/A)
b) Hazard characteristics of the waste(s) to be handled? (265.192(a)(2))	GTR	[ ]		NI	(N/A)
c) Determination by a corrosion expert, if needed (external shell of a metal tank or external metal part in contact with soil or water)? (265.192(a)(3))	GTR	[ ]		NI	(N/A)
d) If needed, design considerations for UST systems effected by vehicular traffic? (265.192(a)(4))	GTR	[ ]		NI	(N/A)
e) Tank system & component installed properly & inspected by independent engineer? (265.192(b))	GTR	[ ]		NI	(N/A)

Comments: RELEASE OF WATER IN SECONDARY CONTAINMENT REPORTED TO DON NEWSOME @ MDEQ, SWQ DIV. IN EARLY JUNE 1997. DON VISITED THE SITE ON 6-19-97. REPAIRS TO THE CONTAINMENT WERE MADE AND WERE EVALUATED AS PART OF THIS CERTIFICATION.

ATTACHMENT C

SECONDARY CONTAINMENT CALCULATIONS

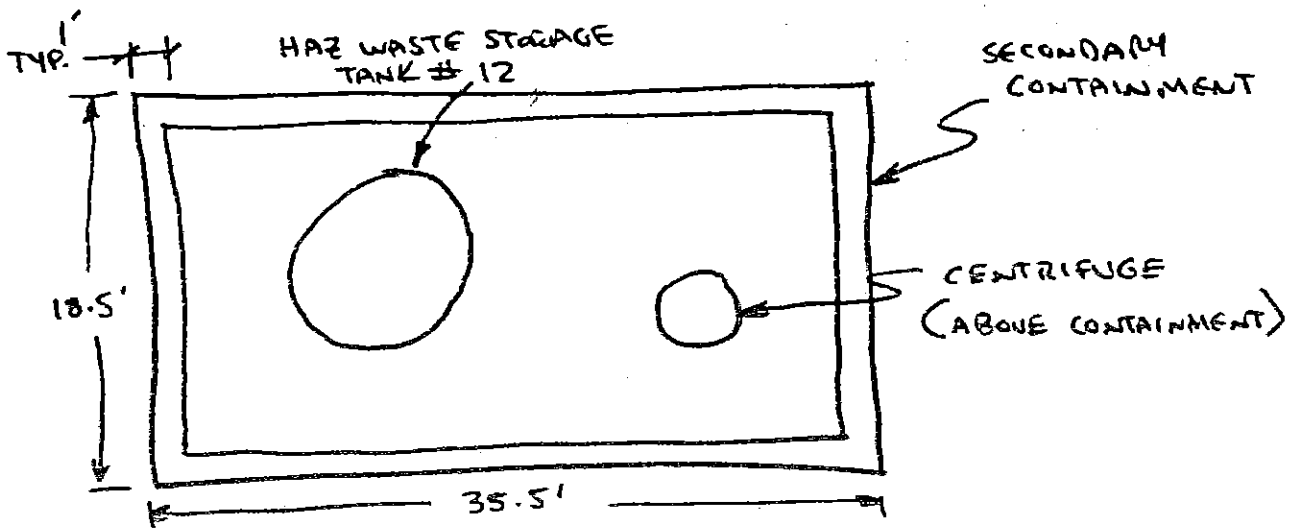
CHESTER ENGINEERS

PROJECT DOUBLE EAGLE STEEL COATINGS CO. PROJECT NO. 3624-22

SHEET 1 OF 1

DWG BY B.A. DATE

HAZ WASTE STORAGE TANK # 12 CHK BY DATE 9-1-97



TOP VIEW

SECONDARY CONTAINMENT VOLUME

33.5' x 16.5' x 6.75' TALL = 3,731 ft^3

3,731 x 7.48 GAL/ft^3 = 27,908 GALLONS IN CONTAINMENT

TANK SLAB VOLUME (16' DIAMETER x 4' TALL)

AREA = πr^2 = 3.14 $(8)^2$ = 201 ft^2

201 ft^2 x 4 ft tall = 804 ft^3

804 x 7.48 $\frac{GAL}{ft^3}$ = 6,014 GALS.

TOTAL CONTAINMENT

27,908 - 6,014 = 21,894 GALLONS

ATTACHMENT D

DAILY CHECKLIST

DOUBLE EAGLE
STEEL COATING COMPANY

DOUBLE EAGLE STEEL COATING CO.

R.C.R.A. VISUAL DAILY HAZARDOUS STORAGE TANK INSPECTION

AREA / TANK #	SUBSTANCE IN STORAGE TANK	VISIBLE LEAKS OR CRACKS IN TANK OR DIKE	LEVEL IN DIKE AREA	OVERFLOW DRAINS INTO DIKE AREA FLOWING?	LEAKING FROM INLET OR DISCHARGE PIPES	CONDITION OF PUMPS/MOTORS	OPERATIVE GAUGES FOR WASTE CUTOFF/ PRESSURE	LEVEL IN TANK (INCHES)	COMMENTS:
AREA # 1 / TANK # 12	WASTE HCD	NO	ZERO	NO	NO		GRAPHIC 215	GRAPHICS 215	
TANK # 43	WASTE OIL								
TANK # 44	WASTE OIL								
TANK WOS-1	HCD/OIL SEPERATOR								
AREA # 2 / (TANK B 11)	WASTE PICKLE (HCl)						GRAPHICS 217	GRAPHICS 217	
AREA # 3 / TANK # 4	FERROUS CHLORIDE							GRAPHICS 223	
TANK # 9	HYDROCHLORIC ACID (HCl)							GRAPHICS 223	
TANK # 8	HYDROCHLORIC ACID (HCl)							GRAPHICS 223	
TANK # 5	GRAIN REFINER (USSP)							GRAPHICS 223	
TANK # 3	ZINC CHLORIDE							GRAPHICS 223	

SCRUBBER 1-A	FLOW RATE GPM	COMMENTS
	[illegible]	

WORK ORDERS NEEDED?: _____

PERSON NOTIFIED OF IMMEDIATE PROBLEM: _____

TIME: [illegible] DATE: 1/6/91

INSPECTOR: [illegible]

Exhibit B

Revision #: 5 Date #: Monday, September 12, 2005 5:19:20 PM
Document ID: 931

S-01-59-10 Holding Tank 12. EPN# LI042

AREA: HCD CLEANER

UNIT: HCD Cleaner

CONTROL ELEMENT: Holding tank 12. EPN #LI042

PURPOSE: To hold waste cleaner solution

RESPONSIBILITY: Quality Engineer

STANDARD: Dike must be kept empty with sufficient room in Tank 12.

MEASUREMENT REQUIREMENT: Visual for dike, EMC display for Tank 12

REPORTING REQUIREMENT: EMC Audit

Lab Report

CORRECTIVE ACTION: Call waste hauler to remove contents of dike and tank **Change**

SERIOUSNESS: MINOR

Revision #: 5
Document ID: 931

Exhibit C

Waste Shipments from Spill Containment/Cleaner Tank Skim
September 2005 to February 2006

Hazardous

Date	Volume	Area	TSD	Code
2/17/06	5700	Secondary Containment	EQD	D002
2/17/06	1800	Secondary Containment	EQD	D002
1/12/06	3000	Cleaner Tank Skim	EQD	D002
1/12/06	3000	Cleaner Tank Skim	EQD	D002
11/7/06	2800	Secondary Containment	EQD	D002

Non Hazardous

Date	Volume	Area	TSD	Code
1/5/2006	3000	Secondary Containment	Usher	029L
1/5/2006	3000	Secondary Containment	Usher	029L
1/5/2006	2800	Secondary Containment	Usher	029L
11/4/2005	2800	Secondary Containment	Usher	029L
11/4/2005	2800	Secondary Containment	Usher	029L
11/4/2005	2800	Secondary Containment	Usher	029L
11/4/2005	2800	Secondary Containment	Usher	029L
11/4/2005	2800	Secondary Containment	Usher	029L
11/7/2005	2200	Secondary Containment	Usher	029L
9/1/2005	3500	Secondary Containment	Usher	029L
9/1/2005	3500	Secondary Containment	Usher	029L
9/9/2005	2500	Secondary Containment	Usher	029L
9/26/05	3500	Secondary Containment	Usher	029L
9/26/05	3500	Secondary Containment	Usher	029L

Exhibit D

General Acid Proofing, Inc.

1051 Bellevue – Detroit, Michigan 48207
Phone (313)571-1700 Fax (313)571-1483
Email: generalacidproof@cs.com

QUOTE NO: 05/7397

AUGUST 11, 2005

DOUBLE EAGLE STEEL COATING COMPANY
3000 MILLER ROAD
DEARBORN, MICHIGAN 48120

ATTENTION: MR. CHRIS McBEE **EMAIL: mcbee@descc.com**

REFERENCE: TANK FARM

SUBJECT: CHEMICAL RESISTANT LINING

DEAR SIR:

We are pleased to submit our quotation for labor and material to repair the fiberglass lining located at the tank farm. All as shown to us on a recent field visit.

WORK TO PROCEED AS FOLLOWS:

- *Cut out all loose and damaged areas on the floor*
- *Remove deteriorated concrete*
- *Sandblast entire inside surface of dike*
- *Prime blasted surface*
- *Patch concrete with a Vinyl Ester Based Grout*
- *Install Fiberglass lining to all bare concrete areas*
- *Install **CEILCOTE 232 FLAKELINE** to the entire inside surface of the dike*

FOR THIS WORK ON A STRAIGHT TIME BASIS, WE QUOTE.....$32,658.00

PLEASE NOTE:

1. All waste generated from this project to be disposed of on customer property.
2. Customer to supply 110-volt electric and city water.
3. Downtime due to loading and unloading of tanker trucks to be on a Time & Material Basis.
4. Applicable state or local taxes are **NOT** included. Terms are net 30 days.

If we can be of further service, please call on us.

Respectfully submitted,

GENERAL ACID PROOFING, INC.

James Crimmins

James Crimmins

JC/sk

General Acid Proofing, Inc.

1051 Bellevue – Detroit, Michigan 48207
Phone (313)571-1700 Fax (313)571-1483
Email: generalacidproof@cs.com

QUOTE NO: 06/7535

January 6, 2006

DOUBLE EAGLE STEEL COATING COMPANY
3000 MILLER ROAD
DEARBORN, MICHIGAN 48120

ATTENTION: MR. CHRIS McBEE
E-MAIL: mcbee@descc.com

REFERENCE: TANK #12 DIKE

SUBJECT: CHEMICAL RESISTANT LINING

Dear Sir,

We are pleased to submit our quotation for labor and material to prepare surface, prime and install Ceilcote Lining 68 with a Ceilcote (Ceilgard 664) Topcoat to the foundation and up 2' on all perimeter walls and piers.

Work to proceed as follows:

1. Remove deteriorated lining.
2. Sandblast exposed area.
3. Chip out and sandblast all cracks above the 2' level and patch.
4. Prime.
5. Fill-in and patch all deteriorated concrete.
6. Install Lining 68.
7. Topcoat with Ceilgard 664.

FOR THIS WORK ON A STRAIGHT TIME BASIS, WE QUOTE.....$29,827.00

PLEASE NOTE:

1. All waste generated from this project to be disposed of on customer property.
2. Customer to provide 110 volt electric supply and city water.
3. Dike to be turned over pumped out and dry.
4. Applicable state or local taxes are **NOT** included. Terms are net 30 days.

Respectfully submitted,

GENERAL ACID PROOFING, INC.

James Crimmins

James Crimmins

JC/sg

DOUBLE EAGLE STEEL COATING COMPANY

PURCHASE ORDER #	O017993		Page 1 of 1
PO REV #	1	REVISION DATE	12/08/2005
PO DUE DATE	10/18/2005	APPROVAL DATE	12/21/2005

DOUBLE EAGLE STEEL COATING COMPANY (BUYER) will purchase and receive and

TO: SUPPLIER CODE: 02144

GENERAL ACID PROOFING, INC
1051 BELLEVUE
DETROIT, MI 48207
UNITED STATES OF AMERICA

Telephone #
(313) 571-1700
Fax #
(313) 571-1483

100% ON TIME DELIVERY REQUIRED
SUPPLIERS MUST COMPLY WITH INDUSTRY QUALITY STANDARDS AND ANY OTHER STANDARDS THAT HAVE BEEN COMMUNICATED BY DOUBLE EAGLE STEEL COATING COMPANY

PAYMENT TERMS	NET 45
FREIGHT	PREPAID

(Seller) will sell and deliver the supplies and services specified herein.

SHIP TO:
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120

SALES AND USE TAXES
Do not bill sales or use tax because purchases are covered by direct pay permits or exemptions 38-2564888

INVOICE TO:
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120
ATTN: ACCOUNTS PAYABLE

Line	DESCC P/N	Delivery Date	Total Qty	UOM	Order Price	ExtCost	Item Status	Line Rev
	Project #/Line #		DES Description				Account	
	Supplier Name						Department	
	Supplier Ref #						Originator	
			Item External Note					
1	D030055	10/18/2005	1	HRS	$32,658.0000	$32,658.00	O	0
			PROVIDE LABOR AND MATERIAL TO REPAIR FILBERGLASS LINING INTANK FARM CONTAINMENT AREA				~~000000~~ 760116	
	GENERAL ACID PROOFING, INC						0000000010	
							WARNER	
2	D030055	10/18/2005	1	HRS	$3,242.6300	$3,242.63	O	1
			PROVIDE LABOR AND MATERIAL TO REPAIR FILBERGLASS LINING INTANK FARM CONTAINMENT AREA				~~000000~~ 760116	
	GENERAL ACID PROOFING, INC						0000000010	
			SATURDAY AND SUNDAY OVERTIME HOURS					

PO External Note: REV#1 WORK CHANGE OVER #1105-6356 TO COVER OVERTIME HOURS. 12/8/05

REFERENCE QUOTE #05/7397 DATED 10/11/05
CHEMICAL RESISTANT LINING TO TANK FARM

WHEN INVOICING US AT DOUBLE EAGLE STEEL COATING CO. THE FULL PART DESCRIPTION NEEDS TO BE ON THE I WHICH IS THE MANUFACTURER NAME, PART NUMBER, AND SERIAL NUMBER WHERE APPLICABLE AND THE FULL DESCRIPTION OF WHAT IT IS. IF THIS INFORMATION IS NOT PROVIDED ON THE INVOICE IT WILL DELAY YOUR PAYME UNTIL ALL THE INFORMATION IS RECEIVED CORRECTLY ON THE INVOICE.

ALL WORK TO BE PERFORMED IN ACCORDANCE WITH DESCC TERMS AND CONDITIONS.

1105-6356
12/15/05

TOTAL PURCHASE ORDER AMOUNT	$35,900.63

Buyer

DOUBLE EAGLE STEEL COATING COMPANY

PURCHASE ORDER #	O017993		Page 1 of 1
PO REV #	0	REVISION DATE	10/18/2005
PO DUE DATE	10/18/2005	APPROVAL DATE	11/08/2005

DOUBLE EAGLE STEEL COATING COMPANY (BUYER) will purchase and receive and

TO: SUPPLIER CODE: 02144

GENERAL ACID PROOFING, INC
1051 BELLEVUE
DETROIT, MI 48207
UNITED STATES OF AMERICA

Telephone #
(313) 571-1700

Fax #
(313) 571-1483

100% ON TIME DELIVERY REQUIRED
SUPPLIERS MUST COMPLY WITH INDUSTRY QUALITY STANDARDS AND ANY OTHER STANDARDS THAT HAVE BEEN COMMUNICATED BY DOUBLE EAGLE STEEL COATING COMPANY

PAYMENT TERMS	NET 45
FREIGHT	PREPAID

(Seller) will sell and deliver the supplies and services specified herein.

SHIP TO:
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120

SALES AND USE TAXES
Do not bill sales or use tax because purchases are covered by direct pay permits or exemptions 38-2564888

INVOICE TO:
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120
ATTN: ACCOUNTS PAYABLE

Line	DESCC P/N	Delivery Date	Total Qty	UOM	Order Price	ExtCost	Item Status	Line Rev
1	D030055	10/18/2005	1	HRS	$32,658.0000	$32,658.00	O	0

Project #/Line #: 000000 7600116
Supplier Name: GENERAL ACID PROOFING, INC
Supplier Ref #:
DES Description: PROVIDE LABOR AND MATERIAL TO REPAIR FILBERGLASS LINING INTANK FARM CONTAINMENT AREA
Account: 0000000010
Department: WARNER
Originator:
Item External Note:

PO External Note: REFERENCE QUOTE #05/7397 DATED 10/11/05
CHEMICAL RESISTANT LINING TO TANK FARM

WHEN INVOICING US AT DOUBLE EAGLE STEEL COATING CO. THE FULL PART DESCRIPTION NEEDS TO BE ON THE I WHICH IS THE MANUFACTURER NAME, PART NUMBER, AND SERIAL NUMBER WHERE APPLICABLE AND THE FULL DESCRIPTION OF WHAT IT IS. IF THIS INFORMATION IS NOT PROVIDED ON THE INVOICE IT WILL DELAY YOUR PAYME UNTIL ALL THE INFORMATION IS RECEIVED CORRECTLY ON THE INVOICE.

ALL WORK TO BE PERFORMED IN ACCORDANCE WITH DESCC TERMS AND CONDITIONS.

TOTAL PURCHASE ORDER AMOUNT	**$32,658.00**

Buyer

Exhibit E

3/16/06

TO: LINE OPERATORS
QA LAB
SHIFT SUPERVISOR

WHEN PUMPING OUT HCD CLEANER RECIRC TANK TO TANK 12, PLEASE VERIFY WITH THE QUALITY ENGINEER OR LINE OPERATOR THAT THE LEVEL IN TANK 12 IS NOT GREATER THAN 85 INCHES. IF THE LEVEL IS GREATER THAN 85 INCHES WE WILL OVERFLOW THE TANK, A TRUCK MUST BE ORDERED IF WE ARE OVER 85 INCHES BEFORE PUMPING OUT THE HCD CLEANER RECIRC TANK.

MIKE MATIGIAN _____

BOB DRABICKI _____

JERRY MLOT _____

JEREMY KNIEPER _____

TOM BRANHAM _____

JOHN RICE _____

WILLIE GAY _____

TIM KHALED _____

BRANDON SLEDGE MELLON _____

TEHRON JONES _____

JEFF SCOTT _____

MIKE SUGGS _____

DENNIS COLE _____

KEVIN RIOPELLE _____

RON LOVELESS Ronald C. Loveless

KARL NORDSTROM Karl Nordstrom

Revision #: 4 Date #: Wednesday, December 15, 2004 2:30:27 PM
Document ID: 1183

RP-05-08-31 HCD Cleaner Concentration Out Of Range

RP-05-08-31

1. DISCUSSION:

1.1 This is the Reaction Plan to cleaner solution concentration testing below minimum or above maximum concentration limits.

1.2 Concentration is controlled through the continuous monitoring by a nuclear density meter signaling an auto-addition valve timer. As the meter reading drops the valve decreases the time in between cycles, thereby increasing the amount of additions.

1.3 The nuclear density meter concentration reading is calibrated with laboratory titration tests. The lab test is considered the true concentration value.

1.4 Laboratory titration of HCD cleaner circulated solution is measure of the Sodium Hydroxide concentration in solution in % by volume.

2. STANDARD:

2.1 Minimum solution concentration is 12.9%. Attempt to bring the solution concentration up into range through corrective actions listed in Step 4.2 while continuing to coat. If the solution concentration is below 11.0%, stop plating and add concentration until the solution concentration tests above the minimum.

2.2 Maximum solution concentration is 16.0% Attempt to bring the solution concentration down into range through corrective actions listed in steps 4.3 while continuing to coat. If the solution concentration is above 20.0%, stop plating and follow the corrective actions listed in 4.3.3 until it tests below 17.0%.

3. RESPONSIBILITY:

Shift Quality Engineer and Chemist during Alloy production

Shift Supervisor

4. CORRECTIVE ACTION:

4.1 Nuclear Density Meter (DI015) out of calibration by more than 1.0%

4.1.1 Confirm extent of drift in meter by getting three tests in a period of twenty-four hours.

4.1.2 Call Instrumentation Department to calibrate meter.

4.1.3 Re-test the concentration after calibration to confirm success.

4.2 Concentration low

4.2.1 Investigate the reason for the low-test result and ask the Shift Supervisor to make a bulk addition with the locked, red handle valve.

Test to confirm concentration in range after addition.

4.2.2 Items to investigate: Report and correct any items found.

- Are all HCD Concentrate valves open (main valve and both auto-addition isolation valves open?)
- Is there enough level in the HCD Concentrate tank (LI181)?
- Is the Auto-addition valve in fault status (FV015)?
- Is the HCD circulation tank level probe accurate (LI014)? Maybe excessive dilution due to false low level reading from level probe causing water addition valve to stay open.
- Is the water addition valve leaking by when it should be closed (FV014)?
- Is their excessive drag out, out of the brush cleaner solution into the HCD line tank?

4.3 Concentration High

4.3.1 Valve off all three of the HCD Concentrate valves and investigate the reason for the high-test result.

4.3.2 If the HCD Circulation tank actual level is below 63", add water to bring the level to 75". This may have to be repeated as the level comes back down.

4.3.3 If the HCD Circulation tank actual level is above 63", add water to bring the level to 90" and open the valve to pump the solution out

4.3.4 To tank 12 until the level drops back down to 52". If tank 12 is full, order a truck to haul it before diverting solution out to the waste cleaner holding tank.

4.4 Items to investigate: Report and correct any items found.

4.4.1 Is the Nuclear Density Meter calibrated low, causing unnecessary

additions of concentrate (DI015)?

4.4.2 Was the bulk addition (red handle) valve left open too long or is it still open?

4.4.3 Is the HCD Circulation tank level probe accurate (LI014)? Maybe reading falsely high preventing water additions and causing high water evaporation rate.

4.4.4 Is the HCD Circulation tank level actually high preventing normal water additions and causing high water evaporation rate?

- Due to a recent calibration/wiring problem of level probe (LI014)?
- Due to previous attempts to manually dilute?
- Due to the water addition valve leaking by when it should be closed (FV014), or
- Due to excessive drag-out of the brush cleaner solution into the HCD line tank.

4.4.5 Is the temperature of the HCD Circulation solution too high due to lack of control causing high water evaporation rate (TIC010)?

- Due to the level too low for the probe to get accurate reading or
- Due to calibration or wiring problems with the probe.

5. CONTAINMENT ACTION

5.1 Low Concentration

5.1.1 Hold coils coated during the time between the last acceptable HCD concentration test and the next test above 11.0% for possible poor adherence even if the adherence tests are passing. Coils coated at 11.0% to 12.9% do not need to be held but the operations, Quality, and Parent Company Managers must be notified.

5.2 High Concentration

5.2.1 Hold coils coated during the time between the last acceptable HCD Concentration test and the next test less than 20.0%. Coils coated at 16.1% to 19.9% not need to be held but the Operations, Quality, and Parent Company Managers must be notified.

Revision #: 4
Document ID: 1183

Exhibit F

WASTE APPROVAL RECERTIFICATION FORM

Waste Approval Number: 3754 Customer Generator Code: 51

Generator Name: Double Eagle Steel Coating

Waste Common Name: Tank 12

Original Characterization Date: 06/26/02

Specific Process ~~Generating the~~ Waste:

Sodium hydroxide & water used to remove oil from rolled steel. The material is used as substitute commercial cleaning product.

Pursuant to the requirements outlined in Dynecol, Inc.'s Act 451 Part B Operating License, Section C-2e (iii), I hereby certify that the following waste stream has not changed from the original characterization over the past year. The process generating, composition, and waste characterization information originally profiled on the Dynecol, Inc. Waste Approval Form is accurate and complete.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe the information I submitted is true, accurate, and complete.

CHRISTOPHER MCBEE
DOUBLE EAGLE STEEL
Generators Name (Please print or type)

6/13/2005
Date

Christopher McBee
Generators Signature

ENVIRONMENTAL ENGINEER
Title

DYNECOL USE ONLY
Approved by: M. Runnels Expiration Date: 6/30/06

SUBSTITUTE COMMERCIAL PRODUCT EVALUATION FORM

APPROVAL #: 3754 CUST/GEN CODE: 51

DESCRIPTION OF MATERIAL:

Sodium hydroxide for cleaning oil from rolled steel

COMMERCIAL PRODUCT THIS MATERIAL IS INTENDED TO REPLACE:

Sodium hydroxide

SPECIFIC USE OF THE MATERIAL:

Use for neutralization

COMPOSITION:	PERCENT:
Water	88%
Sodium hydroxide	10%
Oil	2%
Phosphate	1%
Zinc	1%

CONSTITUENTS NOT TYPICALLY FOUND IN THE COMMERCIAL PRODUCT:

Oil
Phosphate
Zinc

IMPACT OF ADDITIONAL CONSTITUENTS TO THE TREATMENT PROCESS:

None

APPROVED AS A SUBSTITUTE COMMERCIAL PRODUCT (YES) (NO):

Yes

APPROVED BY: MP per J.C.

DYNECOL, INC.
6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7140
FAX: (313) 571-7190

WASTE APPROVAL FORM

RECERT: Y
APPROVAL # 3754

Code: (51)

I GENERAL INFORMATION

Customer: DOUBLE EAGLE STEEL COATING	Generator: SAME
Address: 3000 MILLER RD.	Address:
City: DEARBORN	City:
State: MI Zip Code: 48120	State: Zip Code:
Contact: GREG WINTERHALTER	Contact: Mark Gornick
Phone # 313-203-9829 Fax: 9705	Phone #: Fax:
24 hour phone #	EPA ID # MID981092180

II WASTE DESCRIPTION

Waste Common Name: TANK 12 WASTE

Specific Process Generating the Waste: SODIUM HYDROXIDE AND WATER USED TO REMOVE OIL FROM ROLLED STEEL.

WASTE COMPOSITION (must equal 100%)	Actual %	MIN.		MAX.
WATER		88%		92%
SODIUM HYDROXIDE		6%	-	10%
OIL		2%	-	8%
PHOSPHATE		2%	-	1%
ZINC		1%	-	1%
			-	
			-	
			-	

INDICATE YES(Y) OR NO(N) TO THE FOLLOWING CHARACTERISTICS OR CONTAMINANTS

Carcinogen	N	Oxidizer	N	Organics	Y	Explosives	N	Phenols	N	Hexavalent Chrome	N
Radioactive	N	Poison	N	PCBs	N	Pesticides	N				

As defined in 40 CFR 266: WASTEWATER LIQUID

Sample submitted to Dynecol: YES Color: PURPLE-BLACK

III RCRA / ACT 451 WASTE CHARACTERIZATION

This is a hazardous waste as defined by either Michigan Act 451 of EPA 40 CFR 261: N/A

This is a liquid non-hazardous waste as defined by Michigan Act 451: N/A

If yes, list all waste codes:

This waste contains a toxicity characteristic of 40 CFR 261.24 identified as waste codes D018 through D043: N/A

If yes, list all waste codes:

If based on generator knowledge, please read and understand certification in Section VI

IV SHIPPING INFORMATION

Waste Volume: 750,000 UNIT: (circle one) (GALLONS) POUNDS DRUMS OTHER

Shipment Frequency: (circle one) WEEK MONTH QUARTER (YEAR) ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

RQ, SODIUM HYDROXIDE SOLUTION

DOT Hazard Class: 8 (UN/NA Number: 1824) Packing Group: I (II) III None

V COMMENTS

Profile for informational purposes only. Material used as a substitute commerical chemical product. Source of TDC from oil. NO halogented organic constituents used in process

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete

Mark Cornish
Generator Name (Please print or type)

6 / 26 / 02
Date

Mark Dowd
Generator Signature

Env. Eng
Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, %HOCs (Method 9020) (Nickel and Thallium as necessary)
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc (as necessary)

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes_____ No_____ Complete_____ Partial_____* MSDS_____

*_____ Authorization for Dynecol to perform analysis as necessary

Purchase Order #_____

VIII DYNECOL USE ONLY

Approval #: 3754

Treatment Facility: /

Approved by: M. Dunnells CMF: _____

Expiration date: 9/04/03 Date: 9/04/02

** TOTAL PAGE.02 **

[redacted]

WASTE APPROVAL RECERTIFICATION FORM

Waste Approval Number: 3754 Customer Generator Code: 51

Generator Name: Double Eagle Steel Coating

Waste Common Name: Tank # 12 Waste (water, [illegible] hydroxide)

Original Characterization Date: prior to 2000

Specific Process Generating the Waste:
Sodium Hydroxide Water used to remove oil from rolled steel. The material is used as a substitute Commercial Cleaning product.

Pursuant to the requirements outlined in Dynecol, Inc.'s Act 451 Part B Operating License, Section C-2e (iii), I hereby certify that the following waste stream has not changed from the original characterization over the past year. The process generating, composition, and waste characterization information originally profiled on the Dynecol, Inc. Waste Approval Form is accurate and complete.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe the information I submitted is true, accurate, and complete.

Mark Gornicki
Generators Name (Please print or type)

8/26/03
Date

[signature]
Generators Signature

ENV ENG
Title

DYNECOL USE ONLY
Approved by: M. Russells Expiration Date: 9/12/04

RECERTIFICATION FORM.DOC REVISED 5/14/2003

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY **Client Sample ID:** TK-12

Work Order No: 02080659 **Tag Number:**

Project: **Collection Date:** 08/21/2002

Lab ID: 02080659-002A **Matrix:** AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY; METHOD EPA 1010						Analyst: **LRB**
Ignitability	>200	0		°F	1	08/26/2002
PCBS BY GC; METHOD EPA 8082						Analyst: **PKT**
Aroclor 1016	ND	0.40		µg/L	1	08/28/2002
Aroclor 1221	ND	0.40		µg/L	1	08/28/2002
Aroclor 1232	ND	0.40		µg/L	1	08/28/2002
Aroclor 1242	ND	0.40		µg/L	1	08/28/2002
Aroclor 1248	ND	0.40		µg/L	1	08/28/2002
Aroclor 1254	ND	0.40		µg/L	1	08/28/2002
Aroclor 1260	ND	0.40		µg/L	1	08/28/2002
PH; METHOD EPA 150.1						Analyst: **MJR**
pH	12	1.0		pH Units	1	08/23/2002
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: **KAR**
Reactive Cyanide	ND	0.10		mg/L	1	08/27/2002
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: **KAR**
Reactive Sulfide	ND	100		mg/L	1	08/27/2002
TOTAL ORGANIC CARBON; METHOD: EPA 415.2						Analyst: **SUB**
Total Organic Carbon	2,000	500		mg/L	1	08/27/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY **Client Sample ID:** TK-12

Work Order No: 02080659 **Tag Number:**

Project: **Collection Date:** 08/21/2002

Lab ID: 02080659-002B **Matrix:** LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
ICP METALS;LEACHATE: METHOD EPA 6010B						Analyst: **DH**
Arsenic	ND	0.10		mg/L	1	08/28/2002
Barium	0.26	0.10		mg/L	1	08/28/2002
Cadmium	ND	0.020		mg/L	1	08/28/2002
Chromium	ND	0.10		mg/L	1	08/28/2002
Lead	ND	0.10		mg/L	1	08/28/2002
Selenium	ND	0.20		mg/L	1	08/28/2002
Silver	ND	0.020		mg/L	1	08/28/2002
MERCURY; METHOD EPA 1311/7470A						Analyst: **DH**
Mercury	ND	0.0010		mg/L	1	08/28/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

T - Tentatively Identified Compound (TIC)

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

August 30, 2002

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 02080659

Reference:

Dear Mark Gornick:

Clayton Group Services received 2 samples on 8/21/2002 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 02080659

Analytical comments:
The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Samples were received on August 21, 2002 at an average temperature of 15.5 degrees Celsius.

Total Organic Carbon was subcontracted to Lancaster Laboratories, Lancaster, PA.

Analytical Comments for Method 8082W, sample -001A: Regulatory limits of detection could not be achieved due to sample matrix and limited sample volume.

Analytical Comments for Method 8082W, sample -002A: Regulatory limits of detection could not be achieved due to sample matrix and limited sample volume.

Exhibit G

DYNECOL, INC.
6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7141
FAX (313) 571-7190

January 12, 1998

Mr Larry Aubuchon
Southeast Michigan District Headquarters
Waste Management Division
38980 Seven Mile Road
Livionia, MI 48152

Dear Mr. Aubuchon:

During a recent M D E Q inspection, Ms. Jeanette Noechel informed us that a regulator from the USEPA had requested information regarding a material we received from [redacted], located in [redacted] It is our understanding that [redacted] is claiming that their material is not a solid waste because Dynecol, Inc. reuses this material as an effective substitute for a commercial product

Dynecol, Inc has, over the years, developed a program of reusing materials that if disposed of would be considered solid wastes. Attachment 1-6, Section C, C-1c of our Act 451 Operating License contains the specific parameters utilized when identifying reuse materials This section also provides a specific list of materials for reuse. Once Dynecol determines that a solid waste qualifies as a substitute commercial product, we no longer manage that material as a solid waste Our permit allows us to store substitute commercial products as long as they are not accumulated speculatively I have attached our Standard Operating Procedure, which has been developed to better document our evaluation process, for your file.

Dynecol uses sodium/potassium hydroxide solutions in our treatment process and our air control systems A typical caustic solution used at Dynecol would consist approximately of five to fifteen percent sodium/potassium hydroxide and 85 to 95 percent water This type of material could be used in our treatment operations or in our caustic scrubbers Dynecol also uses more dilute solutions of caustic material to neutralize concentrated acids and to process nitric acid

[redacted] generates a "spent electrolyte" from the process of reclaiming tin This spent electrolyte is made up of water, sodium hydroxide, soaps, sodium carbonate and sodium aluminate Our evaluation of a representative sample of the [redacted] material determined that the alkalinity was about 20 to 30 percent at a specific gravity of 1.38 This percent alkalinity passed our evaluation for neutralizing capability Through generator knowledge, [redacted] identified a composition of five to seven percent of sodium hydroxide, which also meets our minimum requirement The next step in our process is to evaluate any other contaminates that may impact the treatment operation This material contains three other constituents that required evaluation, i.e.: soaps, which can

January 12, 1998
Mr Larry Aubuchon
Continued Page 2

vary from zero to five percent: sodium carbonate, which could vary from twelve to eighteen percent and sodium aluminate, which could vary from zero to five percent

Based on our testing, we determined that other than minor foaming issues, which are easily managed, there would be no negative or beneficial impact to the process from either the soaps or the sodium carbonate The sodium aluminate contained in this material would help our process in both flocculation and sludge conditioning. Our final determination is that the [redacted] material can be substituted for virgin sodium/potassium hydroxide and the net effect of additional constituents actually enhance the value of this material in our treatment process. Based on this information, we issued an approval to [redacted] for receipt of their material as a substitute commercial product

In the past, Dynecol has typically received most substitute commercial products utilizing a Michigan Hazardous Waste Manifest. We feel confident that we have a solid thought process for the use of the manifest as a shipping document but understand your concerns for potential abuse by others, as we discussed on January 8, 1998 We also understand the need to have a uniform system of shipping these types of materials.

Based on our recent telephone discussions, it is my understanding that from this point on you are requesting that the Michigan Hazardous Waste Manifest not be utilized for shipments of substitute commercial products to Dynecol. Typically, generators have been accustomed to using the Michigan manifest and then placing a "R" in box K which identified that the manifested material was intended for reuse. We are currently reviewing our position regarding your decision not to utilize the Michigan manifest as the primary shipping document. Until our review is complete, we have modified our program to comply with your request. We do see a potential problem with non-Michigan regulators but will address those conflicts with your decision not to use the Michigan Hazardous Waste Manifest on a case by case basis

I have enclosed a copy of the back up documentation package for the [redacted] material, as requested. I also realize that this issue can be very complicated. I would suggest that formal documentation regarding the position of the M D E Q might help eliminate future misinterpretations

Should you require any additional information, do not hesitate to call me at (313) 571-7140.

Sincerely,

Dave Lobbestael
Facility Manager

Hands & Associates, Inc
1150 Griswold, Suite 2800
Detroit, Michigan 48226
Phone (313) 963-8870
Fax (313) 963-8875

HANDS & ASSOCIATES

Fax

To: Andy Yaksic, Double Eagle Steel Coating Co. **From:** Terry Begnoche

Fax: 313-203-9705 **Pages:** 6

Phone: 313-203-9829 **Date:** January 12, 1998

Re: Waste versus effective product substitute **CC:** John Vargo

☐ **Urgent** X **For Review** ☐ **Please Comment** ☐ **Please Reply**

• **Comments:** Andy

Attached pages are from Part 111 and Part 121 of MI Act 451 Rules Dynecol is claiming the material from T12 (caustic solution) will be used as an effective substitute for a commercial product in an appropriate manner Basically they are saying the material is not a waste If the material is not a waste it would not be either a hazardous or liquid industrial WASTE, but a substitute for commercial caustic product As per our discussion, I recommend DESCO have Dynecol state this as the basis for receiving the material in writing before shipping a load soley with a hazardous material bill of lading.

In the event that the material is sent elsewhere for treatment or disposal, the full waste requirements would still apply i e DOO2, manifest etc

Call me with any questions

Thanks

Terry

Exhibit H

Tank 12 Loads Shipped

Beneficial Re-use

Date	Gallons
2/3/2005	8000
2/11/2005	8000
2/18/2005	8000
2/22/2005	8000
2/26/2005	8100
3/7/2005	8000
3/14/2005	8100
3/17/2005	8056
3/24/2005	8100
3/29/2005	8056
3/31/2005	8000
4/5/2005	8000
4/9/2005	7000
4/14/2005	8000
4/18/2005	8000
4/25/2005	8000
4/26/2005	8000
4/26/2005	4500
5/2/2005	8000
5/9/2005	8150
5/16/2005	8000
5/23/2005	8000
5/27/2005	8000
6/3/2005	8050
6/10/2005	8000
6/13/2005	6000
6/13/2005	5000
6/13/2005	6000
6/16/2005	8100
6/18/2005	8056
6/20/2005	5300
6/23/2005	8000
7/1/2005	4000
7/1/2005	4257
7/8/2005	8034
7/13/2005	8100
7/15/2005	8034
7/19/2005	8104
7/19/2005	8000
7/22/2005	8034
7/27/2005	8100
8/2/2005	8056
8/8/2005	8087
8/16/2005	9600
8/18/2005	5296
8/19/2005	8034
8/23/2005	5000
8/26/2005	8100
8/26/2005	8050

Manifest as Haz Waste

Date	Gallons
4/14/05	7050
10/17/05	2000
10/17/05	6000

J0987428.XLS
August 18, 2006

8/27/2005	8056
9/2/2005	8078
9/4/2005	5641
9/6/2005	8034
9/6/2005	5000
9/9/2005	8100
9/11/2005	6000
9/11/2005	5200
9/12/2005	8000
9/13/2005	8000
9/16/2005	8187
9/20/2005	5000
9/24/2005	8156
9/28/2005	8200
10/1/2005	6000
10/7/2005	4925
10/13/2005	3000
10/17/2005	8167
10/19/2005	8187
10/21/2005	8056
10/25/2005	8144
10/26/2005	8100
11/1/2005	8040
11/3/2005	5000
11/4/2005	5000
11/4/2005	8100
11/5/2005	8187
11/6/2005	5300
11/6/2005	8100
11/14/2005	8160
11/17/2005	5000
11/17/2005	8000
11/21/2005	5000
11/21/2005	8150
11/23/2005	8186
11/29/2005	5000
11/30/2005	5000
11/30/2005	5000
12/2/2005	8087
12/5/2005	8156
12/6/2005	8087
12/7/2005	5200
12/8/2005	8150
12/13/2005	8200
12/16/2005	6000
12/16/2005	5000
12/20/2005	5200
12/22/2005	5200
12/22/2005	5200
12/22/2005	8113
12/29/2005	5200
1/3/2006	8147

1/6/2006	8034
1/9/2006	8000
1/11/2006	8150
1/13/2006	8187
1/16/2006	8034
1/19/2006	5000
1/19/2006	5000
1/20/2006	5000
1/30/2006	4546
1/30/2006	4625
2/3/2006	8056
2/7/2006	4356
2/8/2006	4982
2/10/2006	5000
2/14/2006	5200
2/14/2006	5200
2/15/2006	5125
2/16/2006	8000
2/17/2006	5040
2/20/2006	5200
2/20/2006	5200
2/20/2006	5200
2/22/2006	5012
2/22/2006	4250
2/22/2006	5006
2/24/2006	8200
2/24/2006	5102
3/2/2006	9344
3/3/2006	5000
3/7/2006	9730
3/9/2006	2700
3/10/2006	4620
3/10/2006	4502
3/13/2006	5700
3/13/2006	5700
3/14/2006	4925
3/14/2006	4870
3/15/2006	5389
3/15/2006	4502
3/17/2006	5432
3/17/2006	5465
3/21/2006	8040
3/22/2006	5133
3/22/2006	4794
3/24/2006	8014
3/28/2006	5162
3/28/2006	5162
3/31/2006	9500

Tank 12 Loads Shipped

Beneficial Re-use

Date	Gallons
2/3/2005	8000
2/11/2005	8000
2/18/2005	8000
2/22/2005	8000
2/26/2005	8100
3/7/2005	8000
3/14/2005	8100
3/17/2005	8056
3/24/2005	8100
3/29/2005	8056
3/31/2005	8000
4/5/2005	8000
4/9/2005	7000
4/14/2005	8000
4/18/2005	8000
4/25/2005	8000
4/26/2005	8000
4/26/2005	4500
5/2/2005	8000
5/9/2005	8150
5/16/2005	8000
5/23/2005	8000
5/27/2005	8000
6/3/2005	8050
6/9/2005	1500
6/10/2005	8000
6/13/2005	6000
6/13/2005	5000
6/13/2005	6000
6/16/2005	8100
6/18/2005	8056
6/20/2005	5300
6/23/2005	8000
7/1/2005	4000
7/1/2005	4257
7/8/2005	8034
7/13/2005	8100
7/15/2005	8034
7/19/2005	8104
7/19/2005	8000
7/22/2005	8034
7/27/2005	8100
8/2/2005	8056
8/8/2005	8087
8/16/2005	9600
8/18/2005	5296
8/19/2005	8034
8/23/2005	5000
8/26/2005	8100

Manifest as Haz Waste

Date	Gallons
4/14/05	7050
10/17/05	2000
10/17/05	6000

8/26/2005	8050
8/27/2005	8056
9/2/2005	8078
9/4/2005	5641
9/6/2005	8034
9/6/2005	5000
9/9/2005	8100
9/11/2005	6000
9/11/2005	5200
9/12/2005	8000
9/13/2005	8000
9/16/2005	8187
9/20/2005	5000
9/24/2005	8156
9/28/2005	8200
10/1/2005	6000
10/7/2005	4925
10/13/2005	3000
10/17/2005	8167
10/19/2005	8187
10/21/2005	8056
10/25/2005	8144
10/26/2005	8100
11/1/2005	8040
11/3/2005	5000
11/4/2005	5000
11/4/2005	8100
11/5/2005	8187
11/6/2005	5300
11/6/2005	8100
11/14/2005	8160
11/17/2005	5000
11/17/2005	8000
11/21/2005	5000
11/21/2005	8150
11/23/2005	8186
11/29/2005	5000
11/30/2005	5000
11/30/2005	5000
11/30/2005	5000
12/2/2005	8087
12/5/2005	8156
12/6/2005	8087
12/7/2005	5200
12/8/2005	8150
12/13/2005	8200
12/16/2005	6000
12/16/2005	5000
12/20/2005	5200
12/22/2005	5200
12/22/2005	5200
12/22/2005	8113

12/29/2005	5200
1/3/2006	8147
1/6/2006	8034
1/9/2006	8000
1/11/2006	8150
1/13/2006	8187
1/16/2006	8034
1/19/2006	5000
1/19/2006	5000
1/20/2006	5000
1/30/2006	4546
1/30/2006	4625
2/3/2006	8056
2/7/2006	4356
2/8/2006	4982
2/10/2006	5000
2/14/2006	5200
2/14/2006	5200
2/15/2006	5125
2/16/2006	8000
2/20/2006	5200
2/20/2006	5200
2/20/2006	5200
2/22/2006	5012
2/22/2006	4250
2/22/2006	5006
2/24/2006	8200
2/24/2006	5102
3/2/2006	9344
3/3/2006	5000
3/7/2006	9730
3/9/2006	2700
3/10/2006	4620
3/10/2006	4502
3/13/2006	5700
3/13/2006	5700
3/14/2006	4925
3/14/2006	4870
3/15/2006	5389
3/15/2006	4502
3/17/2006	5432
3/17/2006	5465
3/21/2006	8040

Exhibit I

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification

April 4, 2006

Customer: EQ INDUSTRIAL SERVICES, INC.
Fax: (734) 547-2502

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: HF041953

Generator EPA ID: MID981092190 **Expires On:** 8/9/2006
Waste Common Name: DOWNTURN CAUSTIC
Comments:

Primary Waste Code: D002

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

.41 gal Hydrazine MDI

HF041953

EQ Tracking # 23699

Sample ID #

EQ WASTE CHARACTERIZATION REPORT

TO EXPEDITE YOUR WASTE APPROVAL, PLEASE COMPLETE THIS FORM ENTIRELY

Please Choose One EQ Management Facility

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive Belleville, MI 48111 Phone: 800-592-5489	Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive Belleville, MI 48111 Phone: 800-592-5489	Fax: 800-592-5329	EPA ID # MID 048 090 633
☐ **Michigan Recovery Systems, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road Romulus, MI 48174 Phone: 800-521-0998	Fax: 734-326-9375	EPA ID # MID 060 975 844
☐ **EQIS – Transfer & Processing** (Drum Transfer/Non-Hazardous Liquid Processing)	1010 Old Rawsonville Road Ypsilanti, MI 48197 Phone: 734-547-1000	Fax: 734-480-9195	EPA ID # MIR 000 033 969

Section 1 - Generator & Customer Information

from EQAI Clm 5/24/04

SIC # ____

Generator EPA ID # MID 981 092 190

Generator DOUBLE EAGLE STEEL COATINGS

Facility Address 3000 Miller ROAD

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address (if different)

City ____ State ____ Zip ____

Generator Contact Mark Gornick

Title ENVIRONMENTAL ENGR.

Phone (313)203-9829 Fax (313)203-9705

EQ Customer No. ____

Invoicing Company EQ Industrial Services

Address 3650 CARPENTER RD

City YPSILANTI State MI Zip 48197

Country ____

Invoicing Contact Karen Newcomer

Phone (734)677-8822 Fax (734)677-8844

Technical Contact John Leonard

Phone ____ Fax ____

Section 2 - Shipping and Packaging Information

2.1) Shipping volume: 250,000

Shipping frequency: ○ One Time Only ○ Annual

2.2) DOT shipping name WASTE CORROSIVE LIQUID, N.O.S. (Sodium Hydroxide)

Density: ____ lbs./gallon or lbs./cubic yard (or) Specific Gravity: ____

8, UN1760, PG II

2.3) Packaging: **(check all that apply)**

- ☐ Bulk Solid (Yd³ < 2000 lbs/yd³)
- ☐ Bulk Solid (Ton >2000 lbs/yd³)
- ☑ Bulk Liquids (Gallons)
- ☐ Cubic Yard Boxes
- ☐ Drums
- ☐ Other (palletized, 5 gal. pails, etc.) ____

Quoted bulk disposal charges for solid materials will be billed by the cubic yd., if waste density is less than 2,000 lbs. per cubic yd. If waste density is greater than 2,000 lbs. per cubic yd., then bulk disposal charges will be billed by the ton regardless of the approved container.

Section 3 - Physical Characteristics

WASTE COMMON NAME: DOWNTURN CAUSTIC

3.1) Color (describe): TAN

3.2) Odor (describe): MILD

3.3) Physical state at 70 °F: **(check all that apply)**

☐ Solid ☐ Dust ☑ Liquid ☐ Sludge

3.4) Does this waste contain?: **(check all that apply)**

☑ Free Liquids ☐ Metal fines ☐ Powders ☑ Oily residue

☐ Biodegradable sorbants ☐ NONE

3.5) Does this waste contain?: **(check all that apply)** ☑ NONE

☐ Asbestos - friable ☐ Pyrophoric waste

☐ Asbestos - non-friable ☐ Reactive waste

☐ Dioxins ☐ Shock Sensitive waste

☐ Furans ☐ Radioactive waste

☐ Biohazard ☐ Explosives

3.6) Describe the composition of the waste (i.e. key chemical compounds, soil, water, ppe, debris, etc.):

Sodium Hydroxide	____ to 90 %
Dirt / Sediment	____ to 3 %
Oil	____ to 7 %
	____ to ____ %
	Total = 100 %

3.7) Does this waste contain > 50% contaminated soil? ○ Yes ● No

3.8) Does this waste contain >50% debris by volume? (debris is greater than 2.5 inches in size) ○ Yes ● No

EQ Tracking #

Section 4 - Generating Process and Regulatory Information

4.1) Provide a *detailed* description of the process (es) generating this waste (attach flow diagram if available):

clean up of high carbon density recirculating system (trenches, sumps) for cleaning coiled steel prior to galvanizing.

Based upon RCRA waste regulations (40 CFR 261) and Michigan Act 451 Rules: Waste Code(s)

4.2) Is this an **EPA RCRA** listed hazardous waste (F, K, P or U)? ○ Yes ● No

4.3) Is this a **MICHIGAN** hazardous waste (Other than RCRA)? ○ Yes ● No

4.4) Is this a **MICHIGAN** nonhazardous liquid industrial waste? ○ Yes ● No

4.5) Is this a **UNIVERSAL** waste? ○ Yes ● No

4.6) Does this waste exceed **LDR** treatment standards? ● Yes ○ No

4.7) Is this an **EPA RCRA** characteristic hazardous waste (D001-D043)? ● Yes ○ No D002

4.8) What is the flash point of this waste? ○ <90°F ○ 90-140°F ○ 140-199°F ● ≥200°F

4.9) Is the waste an oxidizer? ○ Yes ● No

4.10) What is the pH of this waste? ○ <2 ○ 2-4.9 ○ 5-10 ○ 10.1-12.4 ● ≥12.5

4.11) Does this waste contain reactive cyanide ≥ 250 ppm? ○ Yes ● No

4.12) Does this waste contain reactive sulfide ≥ 500 ppm? ○ Yes ● No

4.13) Is the waste surcharge exempt? (attach surcharge form) ○ Yes ● No

Code		Regulatory Level TCLP (mg/L)	Concentration (if above)
D004	Arsenic	5	● Below ○ Above
D005	Barium	100	○ Below ○ Above
D006	Cadmium	1	○ Below ○ Above
D007	Chromium	5	○ Below ○ Above
D008	Lead	5	○ Below ○ Above
D009	Mercury	0.2	○ Below ○ Above
D010	Selenium	1	○ Below ○ Above
D011	Silver	5	○ Below ○ Above
D012	Endrin	0.02	○ Below ○ Above
D013	Lindane	0.4	○ Below ○ Above
D014	Methoxychlor	10	○ Below ○ Above
D015	Toxaphene	0.5	○ Below ○ Above
D016	2,4-D	10	○ Below ○ Above
D017	2,4,5-TP(Silvex)	1	○ Below ○ Above
D018	Benzene	0.5	○ Below ○ Above
D019	CarbonTetrachloride	0.5	○ Below ○ Above
D020	Chlordane	0.03	○ Below ○ Above
D021	Chlorobenzene	100	○ Below ○ Above
D022	Chloroform	6.0	○ Below ○ Above
D023	o-Cresol	200	○ Below ○ Above
D024	m-Cresol	200	○ Below ○ Above
D025	p-Cresol	200	○ Below ○ Above
D026	Cresols	200	○ Below ○ Above
D027	1,4-Dichlorobenzene	7.5	○ Below ○ Above
D028	1,2-Dichloroethane	0.5	○ Below ○ Above
D029	1,1-Dichloroethylene	0.7	○ Below ○ Above
D030	2,4-Dinitrotoluene	0.13	○ Below ○ Above
D031	Heptachlor	0.008	○ Below ○ Above
D032	Hexachlorobenzene	0.13	○ Below ○ Above
D033	Hexachlorobutadiene	0.5	○ Below ○ Above
D034	Hexachloroethane	3.0	○ Below ○ Above
D035	Methyl Ethyl Ketone	200	○ Below ○ Above
D036	Nitrobenzene	2	○ Below ○ Above
D037	Pentachlorophenol	100	○ Below ○ Above
D038	Pyridine	5	○ Below ○ Above
D039	Tetrachloroethylene	0.7	○ Below ○ Above
D040	Trichloroethylene	0.5	○ Below ○ Above
D041	2,4,5-Trichlorophenol	400	○ Below ○ Above
D042	2,4,6-Trichlorophenol	2	○ Below ○ Above
D043	Vinyl Chloride	0.2	○ Below ○ Above

4.14) The hazardous constituent information is based on: ● Analysis (Please attach for review) ● Generator Knowledge ○ Both

4.15) If this is a characteristic (D-coded) hazardous waste, does it contain underlying hazardous constituents (List in Secton5)? ○ Yes ● No ○ N/A

Section 5 - Constituent Information

Review the following items in the EQ Resource Guide and indicate their concentrations below:

1) MVOC (Michigan Volatile Organic Compounds) **2) CCVOC** (Subpart CC Volatile Organic Compounds)

3) UHC (Underlying Hazardous Constituents) **4) TRI** (Toxic Release Inventory Constituents)

Indicate **all** constituents in your waste stream, their concentrations, and select Yes or No for UHC:

UHC?		UHC?	
○ Yes ○ No		○ Yes ○ No	
○ Yes ○ No		○ Yes ○ No	
○ Yes ○ No		○ Yes ○ No	

EQ Tracking #

Section 6 - PCB & TSCA Information

6.1) What is the concentration of PCBs in the waste? ☑ None ○ 0-5 ppm ○ 6-49 ppm ○ 50-499 ppm ○ 500+ppm

6.2) Does the waste contain PCB contamination from a source with a concentration ≥50 ppm? ○ Yes ☑ No

6.3) Does this waste contain free liquids? (use paint filter test) ☑ Yes ○ No

6.4) Has this waste been processed into a non-liquid form? ○ Yes ☑ No

If yes, what was the concentration of PCBs prior to processing? ☑ N/A ○ 0-499 ppm ○ 500+ ppm

6.5) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ○ Yes ☑ No

6.6) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ○ Yes ☑ No

6.7) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☑ N/A ○ Yes ○ No

Section 7 - Benzene NESHAP Information

NESHAP SIC CODES		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

7.1) Does this waste stream contain Benzene? (if "no" to 7.1, please skip to section 8) ○ Yes ☑ No

7.2) Does the waste stream come from a facility with one of the SIC codes listed under NESHAP? ○ Yes ☑ No

7.3) Does your company manage wastes from facilities with Total Annual Benzene(TAB)≥10 Mg/year? ○ Yes ○ No

→ *If you answered "NO" to question 7.2 AND 7.3 please skip to Section 8.*

7.4) Does the waste contain >10 % water? ○ Yes ○ No

7.5) What is the TAB quantity for your facility?_____Mg/Year

7.6) Does the waste contain >1.0 mg/kg total Benzene? ○ Yes ○ No

7.7) What is the total Benzene concentration in your waste? _____percent or _____ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602, and 624.)

Section 8 - Waste Constituent Information

→ COMPLETE FOR MICHIGAN DISPOSAL WASTE TREATMENT PLANT, WAYNE DISPOSAL, AND EQIS T&P

8.1) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? ○ Yes ☑ No

8.2) Does this waste contain any MVOC constituents as defined in the EQ Resource Guide? ○ Yes ☑ No

8.3) Is this waste subject to Subpart CC regulation (i.e., contain ≥500ppm (VOCs) Volatile Organic Compounds)? ○ Yes ☑ No

→ If 8.1, 8.2 or 8.3 is "yes"--please indicate the constituents and their concentrations in the table provided in Section 5

Section 9 - Reclamation/Recycling/Fuel Blending

→ **Complete for Michigan Recovery Systems ONLY**

9.1) Heat value (BTU/lb):_____Chlorine(%):_____Water (%):_____Solids (%):_____

9.2) Is this material a recoverable petroleum product? ○ Yes ○ No

9.3) Is this material for wastewater treatment? ○ Yes ○ No

→ If 9.1 or 9.2 is "yes"-please attach the **Wastewater Addendum Form** found in the **EQ Resource Guide**.

Section 10 - Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Mark Bohnet Printed Name Mark Bohnet

Company Double Eagle Steel Company Title ENV. ENG Date 5/14/01

The generator's signature must appear on the EQ Waste Characterization Report. If the generator has authorized a third-party to certify this document, a written notice (on generator letterhead) must accompany this submittal.
Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM 6/98

Please check the facility you are shipping to:

☑ Michigan Disposal Waste Treatment Plant
(Stabilization and Treatment)
49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID # MID 006 724 531

☐ Wayne Disposal, Inc.
Subtitle C Landfill
(Secure Hazardous Waste Landfill)
49350 N. I-94 Service Drive
Belleville, MI 48111
EPA ID # MID 048 090 633

☐ Michigan Recovery Systems, Inc.
(Solvent Recycling, Fuel Blending & Wastewater Treatment)
49345 Van Born Road
Romulus, MI 48174
EPA ID # MID 060 976 844

Generator Name DOUBLE EAGLE STEEL Generator USEPA ID No. MID 981092180

Generator Address 3000 Miller Road DEARBORN, MI 48120

State Manifest No. _____ Manifest Doc. No. _____

INSTRUCTIONS

- In Column 1 identify all USEPA hazardous waste codes that apply to this waste shipment.
- In Column 2, choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW).
- In Column 3, enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste will be treated using one of the alternative treatment technologies provided by 268.49(c) (soil) or 268.45 (debris).
- In Column 4, circle the letter of the appropriate paragraph from Pages 1-3 of this form.
- In Column 5, for F001-F005, F039, D001-D043, Debris & Contaminated Soil wastes, enter the Reference Number(s) from the EQ Resource Guide—LDR/UHC Constituent Table for any constituents subject to treatment in your waste stream.

Manifest Line Item #	1. USEPA HAZARDOUS WASTE CODE(S)	2. NWW or WW	3. SUBCATEGORY	4. HOW MUST THE WASTE BE MANAGED? (Circle one)	5. REFERENCE NUMBER(S) of Hazardous Constituents contained in the waste. Complete for F001-F005, F039, D001-D043, Soil & Debris wastes.
11.A	D002	☑ NWW ☐ WW		A B C D E F G H I J K L M S	
11.B		☐ NWW ☐ WW		A B C D E F G H I J K L M S	
11.C		☐ NWW ☐ WW		A B C D E F G H I J K L M S	
11.D		☐ NWW ☐ WW		A B C D E F G H I J K L M S	

I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.

Generator Signature Mark Gornick Title Environmental Engineer

Printed Name Mark Gornick Date 5/15/01

HOW MUST THE WASTE BE MANAGED?

For 5, circle the appropriate response for the 5 italicized options:

5. THIS CONTAMINATED SOIL *DOES / DOES NOT* (CIRCLE ONE) CONTAIN LISTED HAZARDOUS WASTE AND *DOES / DOES NOT* (CIRCLE ONE) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND *IS SUBJECT TO / COMPLIES WITH* (CIRCLE ONE) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT STANDARDS. I certify under penalty of law that I have personal examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and believe that it has been maintained and operated properly so as to comply with treatment standards specified in 40 CFR 268.49 without impermissible dilution of the prohibited wastes. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Clayton GROUP SERVICES

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	DOWNTURN CAUSTIC CLEANUP #4242
Work Order No:	01020184	**Tag Number:**	
Project:	Waste Analysis	**Collection Date:**	02/06/2001
Lab ID:	01020184-001A	**Matrix:**	OIL

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY; METHOD EPA 1010						Analyst: LRB
Ignitability	>200	0		°F	1	02/07/2001
PH; METHOD EPA 150.1						Analyst: MJR
pH	10.8	0		pH Units	1	02/07/2001
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: MJR
Reactive Cyanide	ND	0.10		mg/Kg	1	02/08/2001
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: MJR
Reactive Sulfide	ND	96		mg/Kg	1	02/08/2001

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range

Clayton

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	DOWNTURN CAUSTIC CLEANUP #4242
Work Order No:	01020184	**Tag Number:**	
Project:	Waste Analysis	**Collection Date:**	02/06/2001
Lab ID:	01020184-001B	**Matrix:**	OIL

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
PCBS BY GC; METHODS EPA 600/8082						Analyst: BVP
Aroclor 1016	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1221	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1232	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1242	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1248	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1254	ND	2.0		mg/Kg	1	02/12/2001
[illegible]	ND	2.0		mg/Kg	1	02/12/2001

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range

Clayton

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	DOWNTURN CAUSTIC CLEANUP #4242
Work Order No:	01020184	**Tag Number:**	
Project:	Waste Analysis	**Collection Date:**	02/06/2001
Lab ID:	01020184-001C	**Matrix:**	LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
ICP/MS METALS;LEACHED: METHOD EPA 6020						Analyst: RS
Arsenic	8.4	5.0		µg/L	1	02/12/2001
Barium	42	2.0		µg/L	1	02/12/2001
Cadmium	0.20	0.20		µg/L	1	02/12/2001
Chromium	1.0	1.0		µg/L	1	02/12/2001
Lead	ND	3.0		µg/L	1	02/12/2001
Selenium	ND	5.0		µg/L	1	02/12/2001
Silver	0.70	0.50		µg/L	1	02/12/2001
MERCURY; METHOD EPA 1311/7470A						Analyst: CAW
Mercury	ND	0.0010		mg/L	1	02/12/2001

per John Leonard: nickel, thallium, and antimony are not part of process and are not expected contaminants.

Qualifiers:	ND - Not Detected at the Reporting Limit	S - Spike Recovery outside accepted recovery limits
	J - Analyte detected below quantitation limits	R - RPD outside accepted recovery limits
	B - Analyte detected in the associated Method Blank	E - Value above quantitation range
	* - Value exceeds Maximum Contaminant Level	

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY **Client Sample ID:** DOWNTURN CAUSTIC CLEANUP #4242

Workorder No.: 01020184 **Tag Number:**

Project: Waste Analysis **Collection Date:** 2/6/2001

Lab ID: 01020184-001D **Matrix:** OIL

Analyses	Result	Reporting Limit	Units	DF	Date Analyzed
TOTAL HALIDES; METHOD EPA 9076					Analyst: GW
Total Halides	130	9.6	mg/Kg	1	02/18/2001

Qualifiers:

ND - Not Detected at the reporting limit

J - Analyte detected below quantitation limits

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quanitation range

Clayton

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	Client Sample ID:	LAB BLANK
Work Order No:	01020184	Tag Number:	
Project:	Waste Analysis	Collection Date:	02/06/2001
Lab ID:	01020184-002A	Matrix:	AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
PCBS BY GC; METHODS EPA 600/8082						Analyst: BVP
Aroclor 1016	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1221	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1232	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1242	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1248	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1254	ND	2.0		mg/Kg	1	02/12/2001
Aroclor 1260	ND	2.0		mg/Kg	1	02/12/2001
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: MJR
Reactive Cyanide	ND	0.10		mg/Kg	1	02/08/2001
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: MJR
Reactive Sulfide	ND	96		mg/Kg	1	02/08/2001

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range

ANALYTICAL RESULTS

Date: *19-Feb-01*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	Client Sample ID:	LEACHATE BLANK
Work Order No:	01020184	Tag Number:	
Project:	Waste Analysis	Collection Date:	02/06/2001
Lab ID:	01020184-002B	Matrix:	LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
ICP/MS METALS:LEACHED: METHOD EPA 6020						Analyst: RS
Arsenic	ND	5.0		µg/L	1	02/12/2001
Barium	ND	2.0		µg/L	1	02/12/2001
Cadmium	ND	0.20		µg/L	1	02/12/2001
Chromium	ND	1.0		µg/L	1	02/12/2001
Lead	ND	3.0		µg/L	1	02/12/2001
Selenium	ND	5.0		µg/L	1	02/12/2001
Silver	ND	0.50		µg/L	1	02/12/2001
MERCURY: METHOD EPA 1311/7470A						Analyst: CAW
Mercury	ND	0.0010		mg/L	1	02/12/2001

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range

15-20 L month

22345 Raethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

February 19, 2001

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 0102018-4

Reference: Waste Analysis

Dear Mark Gornick:

Clayton Group Services received 2 samples on 02/07/2001 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton

Clayton Group Services **Date:** *19-Feb-01*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Project: Waste Analysis
Work Order No 01020184

CASE NARRATIVE

T. Halogens analysis was subcontracted to Brighton Analytical, Brighton, MI.

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT

Date Results Requested: 2/14/01

Rush Charges Authorized? ☐ Yes ☒ No

☐ Phone or ☒ Fax Results

Page 1 of 1

For Clayton Use Only
Clayton Lab Project No. 0102015

REPORT RESULTS TO			
Name	Mark Gornick	Client Job No.	
Company	Double Eagle Steel	Dept.	
Mailing Address	3000 Miller Road		
City, State, Zip	Dearborn, MI 48120		
Telephone No.	313 203 9829	FAX No.	313 203 - 9705

SEND INVOICE TO	
Purchase Order No.	
Name	
Company	Dept.
Address	
City, State, Zip	

Special instructions and/or specific regulatory requirements: (method, limit of detection, etc.)

Explanation of Preservative

Samples are: (check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED (Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/MEDIA	AIR VOLUME (specify units)	Number of Containers	Corrosivity	Ignitability	MICH 8 TCLP	Reactivity	[illegible]	PCB	Total Organic Halogens			FOR LAB USE ONLY
Dearborn Caustic Cleanup #42-12	2/6/01	9:30AM	W		2	+	+	X	+	+	+	X			TOC Kinetics; PH Ignitability; 3 RUSH
															ME, EV 3 CS Kinetics RUSH
															CS Kinetics, Total Organic Halogens

CHAIN OF CUSTODY			
Collected by: Mark Gornick (print)		Collector's Signature: Mark Gornick	
Relinquished by: Mark Gornick	Date/Time 2/6/01	Received by: [illegible] 2-7-01	Date/Time 2/2[illegible]
Relinquished by:	Date/Time	Received by:	Date/Time
Method of Shipment:		Received at Lab by: [illegible]	Date/Time 2/7/01

Authorized by: Mark Gornick (Client Signature MUST Accompany Request) Date 2/6/01

Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain) [illegible]

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

1/00 20K

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

Downtown Crusher
TK-12

August 30, 2002

Mark Gornick
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 02080659

Reference:

Dear Mark Gornick:

Clayton Group Services received 2 samples on 8/21/2002 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 02080659

Analytical comments:
The Clayton Novi Laboratory is NELAP and AIHA accredited. These accreditations require that we provide the following information on each report: As an analytical result progresses above the reporting limit (RL), it has less variability than a result reported at, or near, the RL.

Samples were received on August 21, 2002 at an average temperature of 15.5 degrees Celsius.

Total Organic Carbon was subcontracted to Lancaster Laboratories, Lancaster, PA.

Analytical Comments for Method 8082W, sample -001A: Regulatory limits of detection could not be achieved due to sample matrix and limited sample volume.

Analytical Comments for Method 8082W, sample -002A: Regulatory limits of detection could not be achieved due to sample matrix and limited sample volume.

ANALYTICAL RESULTS

Date: *30-Aug-02*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	TK-12
Work Order No:	02080659	**Tag Number:**	
Project:		**Collection Date:**	08/21/2002
Lab ID:	02080659-002B	**Matrix:**	LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
ICP METALS;LEACHATE: METHOD EPA 6010B						Analyst: **DH**
Arsenic	ND	0.10		mg/L	1	08/28/2002
Barium	0.26	0.10		mg/L	1	08/28/2002
Cadmium	ND	0.020		mg/L	1	08/28/2002
Chromium	ND	0.10		mg/L	1	08/28/2002
Lead	ND	0.10		mg/L	1	08/28/2002
Selenium	ND	0.20		mg/L	1	08/28/2002
Silver	ND	0.020		mg/L	1	08/28/2002
MERCURY; METHOD EPA 1311/7470A						Analyst: **DH**
Mercury	ND	0.0010		mg/L	1	08/28/2002

Qualifiers:

- ND - Not Detected at the Reporting Limit (RL).
- J - Analyte detected below the Reporting Limit
- B - Analyte detected in the associated Method Blank
- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- R - RPD outside accepted recovery limits
- E - Value above quantitation range
- T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: TK-12
Work Order No: 02080659
Tag Number:
Project:
Collection Date: 08/21/2002
Lab ID: 02080659-002A
Matrix: AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY; METHOD EPA 1010						Analyst: **LRB**
Ignitability	>200	0		°F	1	08/26/2002
PCBS BY GC; METHOD EPA 8082						Analyst: **PKT**
Aroclor 1016	ND	0.40		µg/L	1	08/28/2002
Aroclor 1221	ND	0.40		µg/L	1	08/28/2002
Aroclor 1232	ND	0.40		µg/L	1	08/28/2002
Aroclor 1242	ND	0.40		µg/L	1	08/28/2002
Aroclor 1248	ND	0.40		µg/L	1	08/28/2002
Aroclor 1254	ND	0.40		µg/L	1	08/28/2002
Aroclor 1260	ND	0.40		µg/L	1	08/28/2002
PH; METHOD EPA 150.1						Analyst: **MJR**
pH	12	1.0		pH Units	1	08/23/2002
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: **KAR**
Reactive Cyanide	ND	0.10		mg/L	1	08/27/2002
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: **KAR**
Reactive Sulfide	ND	100		mg/L	1	08/27/2002
TOTAL ORGANIC CARBON; METHOD: EPA 415.2						Analyst: **SUB**
Total Organic Carbon	2,000	500		mg/L	1	08/27/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *30-Aug-02*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY
Client Sample ID: DOWNTURN CAUSTIC CLEANUP

Work Order No: 02080659
Tag Number:

Project:
Collection Date: 08/21/2002

Lab ID: 02080659-001A
Matrix: AQUEOUS

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed
IGNITABILITY; METHOD EPA 1010						Analyst: **LRB**
Ignitability	>200	0		°F	1	08/26/2002
PCBS BY GC; METHOD EPA 8082						Analyst: **PKT**
Aroclor 1016	ND	0.40		µg/L	1	08/28/2002
Aroclor 1221	ND	0.40		µg/L	1	08/28/2002
Aroclor 1232	ND	0.40		µg/L	1	08/28/2002
Aroclor 1242	ND	0.40		µg/L	1	08/28/2002
Aroclor 1248	ND	0.40		µg/L	1	08/28/2002
Aroclor 1254	ND	0.40		µg/L	1	08/28/2002
Aroclor 1260	ND	0.40		µg/L	1	08/28/2002
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2						Analyst: **KAR**
Reactive Cyanide	ND	0.10		mg/L	1	08/27/2002
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2						Analyst: **KAR**
Reactive Sulfide	ND	100		mg/L	1	08/27/2002
TOTAL ORGANIC CARBON; METHOD: EPA 415.2						Analyst: **SUB**
Total Organic Carbon	2,200	500		mg/L	1	08/27/2002

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

REQUEST FOR LABORATORY ANALYTICAL SERVICES

Clayton GROUP SERVICES

IMPORTANT

Date Results Requested: 8/26/02

Rush Charges Authorized? [X] Yes [ ] No

[ ] Phone or [ ] Fax Results EMAIL

_____ of _____

For Clayton Use Only
Clayton Lab Project No.
020C00691

REPORT RESULTS TO

Name: Mark Gorecki
Company: Double Eagle Steel
Mailing Address: 3000 Miller Road
City, State, Zip: Dearborn, MI 48120
Telephone No.: 313-203-5829 FAX No.: 313 2037705
Client Job No.:
Dept.:

SEND INVOICE TO

Purchase Order No.:
Name:
Company: Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

* Explanation of Preservative

Samples are:
(check if applicable)
[ ] Drinking Water
[ ] Groundwater
[ ] Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	MI TCLP '98 Metals	TOC	RCI	TOTAL PCB	FOR LAB USE ONLY
TK-12	8-21-02	1300	W		2	X	X	X	X	

CHAIN OF CUSTODY

Collected by: Mark Gorecki (print) Collector's Signature:
Relinquished by: Mark Gorecki Date/Time 8/21/02 1330
Relinquished by: Date/Time
Method of Shipment:

Received by: 8/21/02 Date/Time 1325
Received by: Date/Time
Received at Lab by: Dan Date/Time 8/21

Authorized by: _____ Date _____
(Client Signature **MUST** Accompany Request)

Sample Condition Upon Receipt: [X] Acceptable [ ] Other (explain)

16.6
15.4

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

1/00 20K

IV SHIPPING INFORMATION

Waste Volume: 750,000 UNIT: (circle one) (GALLONS) POUNDS DRUMS OTHER _____

Shipment Frequency: (circle one) WEEK MONTH QUARTER (YEAR) ONE TIME ONLY

DOT Proper Shipping Name per 49 CFR 172.101:

RQ, SODIUM HYDROXIDE SOLUTION

DOT Hazard Class: 8 (UN)/NA Number: 1824 Packing Group: I (II) III None

V COMMENTS

Profile for informational purposes only. Material used as a substitute commerical chemical product.

VI GENERATOR CERTIFICATION

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste, and I believe that the information I submitted is true, accurate and complete.

X Mark Gornicki
Generator Name (Please print or type)

6 / 26 / 02
Date

X Mark Gornicki
Generator Signature

Env. Eng
Title

VII WASTE ANALYSIS

MINIMUM ANALYTICAL REQUIREMENTS FOR HAZARDOUS WASTES ARE (All Methods per SW846):

- Flash, pH, and Reactives (Detection limit of 20ppm for Cyanide and Sulfide)
- PCBs, %HOCs (Method 9020), (Nickel and Thallium as necessary)
- TCLP metals: Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver
- Michigan metals: Copper and Zinc (as necessary)

(The above items may be restricted from land disposal.)

LABORATORY ANALYSIS IS ATTACHED FOR THE ABOVE ITEMS:

Yes_____ No_____ Complete_____ Partial_____* MSDS_____

* _____ Authorization for Dynecol to perform analysis as necessary

Purchase Order #_____

VIII DYNECOL USE ONLY

Approval #:_____

Treatment Facility:_____ CMF: _____

Approved by: _____ Date: _____

Expiration date: _____

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: 8/26/02
Rush Charges Authorized? ☒ Yes ☐ No
☐ Phone or ☐ Fax Results Email

For Clayton Use Only
Clayton Lab Project No.

____ of ____

REPORT RESULTS TO

Name: Mark Gornick | Client Job No. | Purchase Order No.
Company: Double Eagle Steel | Dept.
Mailing Address: 3000 Miller Road
City, State, Zip: Dearborn, MI 48120
Telephone No.: 313-203-5829 | FAX No.: 313 2037705

SEND INVOICE TO

Name
Company | Dept.
Address
City, State, Zip

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

* Explanation of Preservative

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	MS TCLP & MS/MSD	TOC	RCI	TOTAL PCB	FOR LAB USE ONLY
TK-12	8-21-02	1300	W		2	X	X	X	X	

CHAIN OF CUSTODY

Collected by: Mark Gornick (print) | Collector's Signature:
Relinquished by: Mark Gornick | Date/Time 8/21/02 1330 | Received by: | Date/Time 8/21/02
Relinquished by: | Date/Time | Received by: | Date/Time
Method of Shipment: | Received at Lab by: | Date/Time

Authorized by: _____ Date _____
(Client Signature **MUST** Accompany Request)

Sample Condition Upon Receipt: ☐ Acceptable ☐ Other (explain)

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

1/00 20K

Exhibit J

SHRADER

Analytical and Consulting

LABORATORIES INC.

Report of Analytical Services

Submitted To:

DOUBLE EAGLE STEEL COATING COMPANY
3000 MILLER RD.
DEARBORN, MI 48120

Attn: MR. MARK SWIENTONIOWSKI

We are pleased to provide the enclosed analytical results for the following sample(s). Should you have any questions regarding the methods and/or results, please feel free to write or call.

Client project:	PO# O019006
Client sample:	TANK 12 OIL
Sample description:	COLLECTED 04/10/06
Laboratory project:	O001
Analysis performed:	EPA METHOD 1110
Date received:	11-Apr-06
Date completed:	12-Apr-06
Report date:	12-Apr-06

Verified Signature Not Verified for LJS

Laura J. Stephens, Environmental Manager

Approved Signature Not Verified

Marianne L. Shrader, President

Enclosure(s)

3814 Vinewood · Detroit, Michigan 48208 · (313) 894-4440 · Fax (313) 894-4489 · www.shraderlabs.com

DOUBLE EAGLE STEEL COATING COMPANY

Laboratory Project O001 001 (Continued) Wednesday, April 12, 2006

Sample Number 001 *Sample ID:* TANK 12 OIL

Description: COLLECTED 04/10/06

Date Sampled: 04/10/06 *Matrix:* Oil

Parameter	Result	Units	D.L.	Method	Start	Finish	By
Corrosivity, Nace Steel	<6.35	mm/yr	0.2	1110	04/11/06	04/12/06	GENT

N.D. = Not Detected
D.L. = Detection Limit

SHRADER ANALYTICAL & CONSULTING LABORATORIES, INC.

3814 Vinewood St., Detroit, MI 48208 313-894-4440 Fax: 313-894-4489

CHAIN OF CUSTODY RECORD

Project # 00001

Name: Double Eagle Steel PO#: 0019006

Sampling Site

Sampled by:

Report to:

Lab#	Pres.	Added by/ Date	Sample Description	Sample Matrix	Type C	Type G	# of Cntrs.	Collection Date/Time	Analyses: Cr, Ni, Cu
001			Tank 12 Oil	oil		x	1	4/10/06	x

Method of Shipment: Drop off Date/Time:

Received by: [illegible] Date/Time: 4/11/06 1200

Received by:

Comments:

Relinquished by: [signature] Date/Time: 04-11-06 12:00PM

Relinquished by: Date/Time:

Temperature:

Approval # 080805-O

Pricing Scale Quote

By _____

Date _____

USHER

OIL COMPANY

...safely recycling since 1930

9000 ROSELAWN
DETROIT, MICHIGAN 48204
Phone (313) 834-7055 Fax (313) 834-7036

EPA ID# MID-016-985-814

USED OIL / WASTEWATER PROFILE

Please complete all applicable sections and return with a representative sample.

SECTION 1 **GENERATOR INFORMATION**

Generator DOUBLE EAGLE STEEL COATING ID# MID-981-042-190

Address 3000 MILLER RD.

City DEARBORN State MI Zip 48120

Contact CHRIS MCBEE Phone 313-203-9829 Fax _____

SECTION 2 **TRANSPORTER INFORMATION**

Transporter _____ ID# ____-____-____-____

Address _____

City _____ State _____ Zip _____

Contact _____ Phone _____ Fax _____

SECTION 3 **BILLING INFORMATION**

Customer DOUBLE EAGLE STEEL Phone 313-203-9818

Address 3000 MILLER RD Fax _____

City DEARBORN State MI Zip 48120

Contact ~~ACCOUNTS~~ ACCOUNTING

SECTION 4 **WASTE DESCRIPTION**

Common Name USED OIL Waste Code(s) OILC

Process Generating Waste OIL SEPARATED FROM CLEANING SOL'N

Shipping Volume 7500 gal Frequency QUARTER Bulk X Drums _____

Generator's Signature Christopher McBee Date 8/5/05

SECTION 5 PHYSICAL CHARACTERISTICS

Color: BLACK Odor: None ☐ Mild ☒ Strong ☐

Physical State: Liquid ☒ Solid ☐ Sludge ☐

Layer: Single Phase ☒ Bi-Phase ☐ Multi-Phase ☐

Density: 8.3 g/cc or (lbs/gal) Flash Point: <140°F ☐ 140 - 200°F ☐ >200°F ☒

pH: <2.0 ☐ 2.0 – 4.0 ☐ 4.1 - 10.0 ☒ 10.1 - 12.5 ☐ >12.5 ☐

SECTION 6 USED OIL RECLAMATION

Is this material regulated as a **"used oil"** by 40 CFR 279 and Michigan Act 451 Part 111? Yes ☒ No ☐

If yes, complete this section. If no, skip to Section 7.

Composition: Oil 50-75 % Water 0-25 % Solids 0-10 %

Total Halogens <1000 ppm. If >1,000 ppm additional, F scan analysis or MSDS is required.

Certification of Used Oil Stream (please check all that apply):

_____ The used oil stream has been mixed with hazardous waste, which was generated by a conditionally exempt small quantity generator. See 40 C.F.R. 261.5; Mich. Admin. Code R 299.9205. (CESQG Certification Required)

_____ The used oil stream contains polychlorinated biphenyl (PCB's). PCB's_____ppm

_____ The used oil stream has been mixed with a characteristic hazardous waste. See 40 C.F.R. Part 261 Subpart C; Mich. Admin. Code R 299.9212.

_____ The used oil stream contains chlorinated paraffins. (Material Safety Data Sheet Required)

_____ The used oil stream contains halogenated chemicals, which are not hazardous wastes. Please specify: _____

I, hereby, certify that this used oil stream has not been mixed with, or does not contain, hazardous waste regulated under the federal Resource Conservation and Recovery Act 40 CFR Part 261 or Michigan Act 451 Part 111.

Generator's Signature Christopher McGee Date 8/5/15

Print Name CHRISTOPHER MCGEE Title Envi. Engineer

Please proceed to Section 7.

SECTION 7 WASTE CHARACTERIZATION

Attach laboratory analysis, MSDS or other supporting documentation.

			Waste Code(s)
1. Does the waste meet any F, K, P or U listing description before or after treatment?	☒ No	☐ Yes	_____
2. Does the waste exhibit the characteristic of Ignitability?	☒ No	☐ Yes	_____
3. Does the waste exhibit the characteristic of Corrosivity?	☒ No	☐ Yes	_____
4. Does the waste exhibit the characteristic of Reactivity? (e.g. Cyanide > 250 ppm or Sufide > 500 ppm.)	☒ No	☐ Yes	_____
5. Does the waste exhibit a TCLP Constituent above the characteristic limit ? (see section 9)	☒ No	☐ Yes	_____
6. Is this a non-hazardous liquid industrial waste regulated under Michigan's Act 451 (Part 121)?	☒ No	☐ Yes	_____
7. Does the waste contain PCB's >1.0 ppm or is it derived from a source containing >50 ppm?	☒ No	☐ Yes	
8. Does the facility generate any hazardous waste?	☐ No	☒ Yes	
9. If yes, are they segregated from this waste stream?	☐ N/A	☒ Yes	
10. Would the waste have to meet "Categorical Discharge Limitations" specified in 40 CFR Parts 402 through 699, if treated on-site?	☒ No	☐ Yes	
11. Does the waste contain VOC's >500 ppm/wt.	☒ No	☐ Yes	
12. Does the waste contain total Mercury >260 ppm?	☒ No	☐ Yes	
13. Is this waste generated as a result of UST activity?	☒ No	☐ Yes	
14. Is this a fuel (gasoline or diesel) regulated recycled petroleum product (RPP)?	☒ No	☐ Yes	

SECTION 8 GENERATOR CERTIFICATION

I certify, to the best of my knowledge, that I am familiar with this waste stream through analyses and/or knowledge, and that all information submitted is true, accurate and complete and that all known or suspected hazards have been disclosed.

enerator's Signature _____ Title _____ Date _____

SECTION 9 — TCLP CERTIFICATION

➢Mark the "Yes" column to indicate which TCLP testing has been conducted. (Attach lab results).
➢For those constituents not tested, mark "No" and sign the certification provided.
➢Either "Yes" or "No" MUST be checked for each and every constituent.

	TCLP REGULATORY ACTION LEVELS		CONSTITUENT TESTING CONDUCTED OR CERTIFICATION
ZHE ORGANICS*	mg/L	YES	NO
D018 Benzene	0.5	☐	☐
D019 Carbon Tetrachloride	0.5	☐	☐
D021 Chlorobenzene	100.0	☐	☐
D022 Chloroform	6.0	☐	☐
D028 1,2-Dichloroethane	0.5	☐	☐
D029 1,1-Dichloroethylene	0.7	☐	☐
D035 Methyl Ethyl Ketone	200.0	☐	☐
D039 Tetrachloroethylene	0.7	☐	☐
D040 Trichloroethylene	0.5	☐	☐
D043 Vinyl Chloride	0.2	☐	☐

CERTIFICATION
"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"

Signed: _____

METALS*			NO
D004 Arsenic	5.0	☐	☐
D005 Barium	100.0	☐	☐
D006 Cadmium	1.0	☐	☐
D007 Chromium	5.0	☐	☐
D008 Lead	5.0	☐	☐
D009 Mercury	0.2	☐	☐
D010 Selenium	1.0	☐	☐
D011 Silver	5.0	☐	☐
001D Copper	100.0	☐	☐
003D Zinc	500.0	☐	☐

CERTIFICATION
"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"

Signed: _____

ACID EXTRACTABLES*			NO
D023 o-Cresol	200.0	☐	☐
D024 m-Cresol	200.0	☐	☐
D025 p-Cresol	200.0	☐	☐
D026 Cresol	200.0	☐	☐
D037 Pentachlorophenol	100.0	☐	☐
D041 2,4,5-Trichlorophenol	400.0	☐	☐
D042 2,4,6-Tricholrophenol	2.0	☐	☐

CERTIFICATION
"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"

Signed: _____

BASE NEUTRAL EXTRACTABLES*			NO
D027 1,4-Dichlorobenzene	7.5	☐	☐
D030 2,4-Dinitrololuene	0.13	☐	☐
D032 Hexachlorobenzene	0.13	☐	☐
D033 Hexachlorobutadiene	0.5	☐	☐
D034 Hexachloroethane	3.0	☐	☐
D036 Nitrobenzene	2.0	☐	☒
D038 Pyridine	5.0	☐	☐

CERTIFICATION
"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"

Signed: _____

PESTICIDES*			NO
D020 Chlordane	0.03	☐	☐
D012 Endrin	0.02	☐	☐
D031 Heptachlor (& itshydroxide)	0.008	☐	☐
D013 Lindane	0.4	☐	☐
D014 Methoxychlor	10.0	☐	☐
D015 Toxaphene	0.5	☐	☐
HERBICIDES*			
D016 2,4-D	10.0	☐	☐
D017 2,4,5-TP (Silvex)	1.0	☐	☐

CERTIFICATION
"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"

Signed: _____

Signed: _____

USHER OIL
PRE-APPROVAL
FINGERPRINT ANALYSIS

Generator/Customer Double Eagle Date 8-8-05

Sample Submitted By _____ ID# _____

Waste Description Oil & Water Color Black

% Oil 30 % Solids 1

% Water 59 % Rag 10

Total Chlorine 138 (PPM) Flash Point >200°F

Total Zinc _____ (PPM) pH 7

Reactivity None ___ Mild X Strong ___

Odor None ___ Mild ___ Strong X

Describe _____

Is This Waste Stream Suitable for Treatment / Reclamation at this Facility?

Accepted X Rejected _____ Reason _____

Analyst Jamie

Exhibit K

Approval # 071205-O Date _____

Pricing _____

_____

By _____

USHER

OIL COMPANY

...safely recycling since 1930

9000 ROSELAWN
DETROIT, MICHIGAN 48204
Phone (313) 834-7055 Fax (313) 834-7036

Geardil
Weds 7:30AM
500gals

EPA ID# MID-016-985-814

USED OIL / WASTEWATER PROFILE

Please complete all applicable sections and return with a representative sample.

SECTION 1 GENERATOR INFORMATION

Generator DOUBLE EAGLE ID# MID-981-092-190
Address 3000 MILLER ROAD
City DEARBORN State MI Zip 48120
Contact CHRISTOPHER McBee Phone 313-203-9829 Fax 313-203-9795

SECTION 2 TRANSPORTER INFORMATION

Transporter TBD ID# ____-____-____-____
Address _____
City _____ State _____ Zip _____
Contact _____ Phone _____ Fax _____

SECTION 3 BILLING INFORMATION

Customer SAME AS GENERATOR Phone 313-203-9809
Address _____ Fax _____
City _____ State _____ Zip _____
Contact ACCTS PAYABLE

SECTION 4 WASTE DESCRIPTION

Common Name OIL & WATER (TANK 43 & 44) Waste Code(s) 029 L
Process Generating Waste OIL WATER SEPARATOR, Basement water, plant cleanup oil & water

Shipping Volume 400,000gal Frequency Annually Bulk X Drums _____
Generator's Signature Christopher McBee Date 7/11/05

SECTION 5 PHYSICAL CHARACTERISTICS

Color: Black/gray Odor: None ☐ Mild ☒ Strong ☐

Physical State: Liquid ☒ Solid ☐ Sludge ☐

Layer: Single Phase ☐ Bi-Phase ☐ Multi-Phase ☒

Density: 8.34 g/cc or (lbs/gal) Flash Point: <140°F ☐ 140 - 200°F ☐ >200°F ☒

pH: <2.0 ☐ 2.0 – 4.0 ☐ 4.1 - 10.0 ☒ 10.1 - 12.5 ☒ >12.5 ☐

SECTION 6 USED OIL RECLAMATION

Is this material regulated as a **"used oil"** by 40 CFR 279 and Michigan Act 451 Part 111? Yes ☒ No ☐

If yes, complete this section. If no, skip to Section 7.

Composition: Oil 10-20 % Water 0-95 % Solids_____%

Total Halogens < 1000 ppm. If >1,000 ppm additional, F scan analysis or MSDS is required.

Certification of Used Oil Stream (please check all that apply):

_____ The used oil stream has been mixed with hazardous waste, which was generated by a conditionally exempt small quantity generator. See 40 C.F.R. 261.5; Mich. Admin. Code R 299.9205. (CESQG Certification Required)

_____ The used oil stream contains polychlorinated biphenyl (PCB's). PCB's_____ppm

_____ The used oil stream has been mixed with a characteristic hazardous waste. See 40 C.F.R. Part 261 Subpart C; Mich. Admin. Code R 299.9212.

_____ The used oil stream contains chlorinated paraffins. (Material Safety Data Sheet Required)

_____ The used oil stream contains halogenated chemicals, which are not hazardous wastes. Please specify: _____

I, hereby, certify that this used oil stream has not been mixed with, or does not contain, hazardous waste regulated under the federal Resource Conservation and Recovery Act 40 CFR Part 261 or Michigan Act 451 Part 111.

Generator's Signature Christopher McBee Date 7/11/05

Print Name CHRISTOPHER McBee Title ENVIRONMENTAL ENGINEER

Please proceed to Section 7.

SECTION 7 WASTE CHARACTERIZATION

Attach laboratory analysis, MSDS or other supporting documentation.

			Waste Code(s)
1. Does the waste meet any F, K, P or U listing description before or after treatment?	☑ No	☐ Yes	
2. Does the waste exhibit the characteristic of Ignitability?	☑ No	☐ Yes	
3. Does the waste exhibit the characteristic of Corrosivity?	☑ No	☐ Yes	
4. Does the waste exhibit the characteristic of Reactivity? (e.g. Cyanide > 250 ppm or Sufide > 500 ppm.)	☑ No	☐ Yes	
5. Does the waste exhibit a TCLP Constituent above the characteristic limit ? (see section 9)	☑ No	☐ Yes	
6. Is this a non-hazardous liquid industrial waste regulated under Michigan's Act 451 (Part 121)?	☐ No	☑ Yes	
7. Does the waste contain PCB's >1.0 ppm or is it derived from a source containing >50 ppm?	☑ No	☐ Yes	
8. Does the facility generate any hazardous waste?	☐ No	☑ Yes	
9. If yes, are they segregated from this waste stream?	☐ N/A	☑ Yes	
10. Would the waste have to meet "Categorical Discharge Limitations" specified in 40 CFR Parts 402 through 699, if treated on-site?	☑ No	☐ Yes	
11. Does the waste contain VOC's >500 ppm/wt.	☑ No	☐ Yes	
12. Does the waste contain total Mercury >260 ppm?	☑ No	☐ Yes	
13. Is this waste generated as a result of UST activity?	☑ No	☐ Yes	
14. Is this a fuel (gasoline or diesel) regulated recycled petroleum product (RPP)?	☑ No	☐ Yes	

SECTION 8 GENERATOR CERTIFICATION

I certify, to the best of my knowledge, that I am familiar with this waste stream through analyses and/or knowledge, and that all information submitted is true, accurate and complete and that all known or suspected hazards have been disclosed.

Christopher McGee ENVIRONMENTAL ENGINEER 7/11/05

Generator's Signature Title Date

SECTION 9 — TCLP CERTIFICATION

Mark the "Yes" column to indicate which TCLP testing has been conducted. (Attach lab results).
For those constituents not tested, mark "No" and sign the certification provided.
Either "Yes" or "No" MUST be checked for each and every constituent.

	TCLP REGULATORY ACTION LEVELS		CONSTITUENT TESTING CONDUCTED OR CERTIFICATION
ZHE ORGANICS*	mg/L	YES	NO — CERTIFICATION
D018 Benzene	0.5	☐	☐ "Based upon my knowledge of the waste
D019 Carbon Tetrachloride	0.5	☐	And the process generating the waste,
D021 Chlorobenzene	100.0	☐	These constituents are not present in the
D022 Chloroform	6.0	☐	Waste above hazardous classification
D028 1,2-Dichloroethane	0.5	☐	Levels"
D029 1,1-Dichloroethylene	0.7	☐	
D035 Methyl Ethyl Ketone	200.0	☐	Signed: C. M Bee 7/11/05
D039 Tetrachloroethylene	0.7	☐	
D040 Trichloroethylene	0.5	☐	
D043 Vinyl Chloride	0.2	☐	
METALS*			NO — CERTIFICATION
D004 Arsenic	5.0	☐	☐ "Based upon my knowledge of the waste
D005 Barium	100.0	☐	And the process generating the waste,
D006 Cadmium	1.0	☐	These constituents are not present in the
D007 Chromium	5.0	☐	Waste above hazardous classification
D008 Lead	5.0	☐	Levels"
D009 Mercury	0.2	☐	
D010 Selenium	1.0	☐	Signed: C. M Bee 7/11/05
D011 Silver	5.0	☐	
001D Copper	100.0	☐	
003D Zinc	500.0	☐	
ACID EXTRACTABLES*			NO — CERTIFICATION
D023 o-Cresol	200.0	☐	☐ "Based upon my knowledge of the waste
D024 m-Cresol	200.0	☐	And the process generating the waste,
D025 p-Cresol	200.0	☐	These constituents are not present in the
D026 Cresol	200.0	☐	Waste above hazardous classification
D037 Pentachlorophenol	100.0	☐	Levels"
D041 2,4,5-Trichlorophenol	400.0	☐	
D042 2,4,6-Tricholrophenol	2.0	☐	Signed: C. M Bee 7/11/05
BASE NEUTRAL EXTRACTABLES*			NO — CERTIFICATION
D027 1,4-Dichlorobenzene	7.5	☐	☐ "Based upon my knowledge of the waste
D030 2,4-Dinitrololuene	0.13	☐	And the process generating the waste,
D032 Hexachlorobenzene	0.13	☐	These constituents are not present in the
D033 Hexachlorobutadiene	0.5	☐	Waste above hazardous classification
D034 Hexachloroethane	3.0	☐	Levels"
D036 Nitrobenzene	2.0	☐	
D038 Pyridine	5.0	☐	Signed: C. M Bee 7/11/05
PESTICIDES*			NO — CERTIFICATION
D020 Chlordane	0.03	☐	☐ "Based upon my knowledge of the waste
D012 Endrin	0.02	☐	And the process generating the waste,
D031 Heptachlor (& itshydroxide)	0.008	☐	These constituents are not present in the
D013 Lindane	0.4	☐	Waste above hazardous classification
D014 Methoxychlor	10.0	☐	Levels"
D015 Toxaphene	0.5	☐	Signed: C. M Bee 7/11/05
HERBICIDES*			
D016 2,4-D	10.0	☐	Signed: C. M Bee 7/11/05
D017 245-TP Silvex	1.0	☐	

USHER OIL
PRE-APPROVAL
FINGERPRINT ANALYSIS

Generator/Customer Dynecol / Double Eagle Date 5-18-05

Sample Submitted By _____ ID# _____

Waste Description Tank 43/44 Color Green/Clear

% Oil 10 % Solids 1

% Water 89 % Rag _____

Total Chlorine 526 (PPM) Flash Point >200°F

Total Zinc _____ (PPM) pH 8

Reactivity None X Mild ___ Strong ___

Odor None ___ Mild X Strong ___

Describe _____

Is This Waste Stream Suitable for Treatment / Reclamation at this Facility?

Accepted X Rejected _____ Reason _____

Analyst Jami

Exhibit L

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

April 4, 2006

Customer: EQIS - ROLL OFF DIVISION
Fax: (734) 547-2505

BOB ZARB
DOUBLE EAGLE
ATTN: CHRIS MCBEE
3000 MILLER ROAD
DEARBORN, MI 48120

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: HF054693

Generator EPA ID: MID981092190
Waste Common Name: DOOR 10 SLUDGE
Comments:

Expires On: 8/31/2006

Primary Waste Code: 029L

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

HF054693

WASTE CHARACTERIZATION REPORT

T# 114442

metals float

I authorize EQ – The Environmental Quality Company to choose the appropriate method of waste management, from the technologies offered, at the EQ facilities identified below.

☒ **Michigan Disposal Waste Treatment Plant** (Stabilization and Treatment)	49350 N. I-94 Service Drive, Belleville, MI 48111	Phone: 800-592-5489	Fax: 800-592-5329	EPA ID # MID 000 724 831
☐ **Wayne Disposal, Inc. Site #2 Landfill** (Hazardous & Chemical Waste Landfill)	49350 N. I-94 Service Drive, Belleville, MI 48111	Phone: 800-592-5489	Fax: 800-592-5329	EPA ID # MID 048 090 633
☒ **EQ Detroit, Inc.** (Stabilization, Wastewater Treatment)	1923 Frederick Street, Detroit, MI 48211	Phone: 800-495-6059	Fax: 313-923-3375	EPA ID # MID 980 991 566
☐ **EQ Resource Recovery, Inc.** (Solvent Recycling, Fuel Blending, WW Treatment)	36345 Van Born Road, Romulus, MI 48174	Phone: 866-373-8357	Fax: 734-326-4033	EPA ID # MID 060 975 844
☐ **EQ North Carolina** (Stabilization, Treatment, Labpack Decommissioning)	1005 Investment Blvd, Apex, NC 27502	Phone: 919-363-4700	Fax: 919-363-4714	EPA ID # NCD 982 170 292
☐ **EQ Florida, Inc.** (Drum Consolidation, Labpack Decommissioning)	7202 East 8th Ave, Tampa, FL 33619	Phone: 800-624-5302	Fax: 813-628-0842	EPA ID # FLD 981 932 494
☐ **EQ Transfer & Processing** (Drum Transfer/Non-Hazardous Waste Processing)	1010 Old Rawsonville Rd., Ypsilanti, MI 48198	Phone: 734-547-1000	Fax: 734-480-9195	EPA ID #MI0 000 263 871 EPA ID #MIR 000 033 969
☐ **EQ Indianapolis** (Drum Transfer/Non-Hazardous Waste Processing)	4000 West 10th Street, Indianapolis, IN 46222	Phone: 317-247-7160	Fax: 317-247-7170	EPA ID #MI0 000 263 871
☐ **EQ Atlanta** (Drum Transfer/Non-Hazardous Waste Processing)	5600 Fulton Industrial Blvd SW, Atlanta, GA 30336	Phone: 404-494-3520	Fax: 404-494-3560	EPA ID #MI0 000 263 871
☐ **EQ Augusta, Inc.** (Wastewater Treatment)	3920 Goshen Industrial Blvd, Augusta, GA 30906	Phone: 706-771-9100	Fax: 706-771-9124	EPA ID # GAR 000 011 817

Waste Common Name: DOOR IO ~~PAINT~~ SLUDGE

Section 1 – Generator & Customer Information

SIC/NAICS* _____

Generator EPA ID # MID 981 092 190

Generator DOUBLE EAGLE STEEL

Facility Address 3000 MILLER ROAD

City Dearborn State MI Zip 48120

County WAYNE

Mailing Address _____

City _____ State _____ Zip _____

Generator Contact CHRISTOPHER McGEE

Title ENV. ENGINEER

Phone 313 203 9829 Fax 313 203 9705

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Internal Use Only: EQ Division _____

EQ Customer No. 4077

Invoicing Company EQIS

Address _____

City _____ State _____ Zip _____

Country _____

Invoicing Contact _____

Phone _____ Fax _____

Technical Contact _____

Phone _____ Fax _____

Mobile _____ Pager _____

E-mail _____

Section 2 – Shipping & Packaging Information

2.1) Shipping Volume & Frequency ~~XXX~~ 80yd

☐ One Time Only ☐ Year ☐ Quarter ☒ Month

2.2) DOT Shipping Name

OTHER WASTE

029L

2.3) Is this waste surcharge exempt? ☐ Yes ☒ No

If yes, please attach a surcharge exemption form, found in Section 2 of the EQ Resource Guide.

2.4) Packaging (**check all that apply**)

☐ Bulk Solid (Yd^3 < 2000 lbs/yd^3)

☐ Bulk Solid (Ton >2000 lbs/yd^3)

☒ Bulk Liquids (Gallon)

☐ Totes, Size _____

☐ Cubic Yard Boxes/Bags

☐ Drums

☐ Other (palletized, 5 gal. Pail, etc.) _____

Quoted bulk disposal charges for solid materials will be billed by the cubic yard, if the waste density is less than 2,000lbs./cubic yard. If waste density is greater than 2,000 lbs./cubic yard, then bulk disposal charges will be billed by the ton, regardless of the approved container.

Section 3 – Physical Characteristics

Color RUST to Black 3.2) Odor NONE

3.3) Does this waste contain any "Potentially Odorous Constituents" as defined in the EQ Resource Guide? (Section 3) ☐ Yes ☒ No

3.4) Physical State at 70°F: ☐ Solid ☐ Dust/Powder ☐ Liquid ☒ Sludge

3.5) What is the pH of this waste? ☐ ≤2 ☒ 2.1-4.9 ☐ 5-10 ☐ 10.1-12.4 ☐ ≥12.5

3.6) What is the flash point of this waste? ☐ <90°F ☐ 90-140°F ☐ 140-199°F ☒ >200°F

3.7) Does this waste contain? (check all that apply) ☐ None ☒ Free Liquids ☐ Oily Residue ☐ Metal Fines

☐ Biodegradable Sorbants ☐ Amines ☐ Ammonia ☐ Dioxins ☐ Furans ☐ Biohazard

☐ Shock Sensitive Waste ☐ Reactive Waste ☐ Radioactive Waste ☐ Explosives ☐ Pyrophoric Waste ☐ Isocyanates

☐ Asbestos – non-friable ☐ Asbestos – friable

Section 4 – Waste Composition and Generating Process

4.1) Describe the physical composition of the waste (i.e., soil, water, PPE, debris, key chemical compounds, etc.)

SLUDGE 100 to 100 % _____ to ____ %

_____ to ____ % _____ to ____ %

Total: 100%

4.2) Provide a *detailed* description of the process generating this waste (attach flow diagram if available).

FILTER PRESS (SLUDGE) RESIDUE - LIQUID. PROCESS IS ZINC PLATING SOLUTIONS FROM STEEL GALVANIZING OPERATIONS, SAME MATERIAL AS EQ APPROVAL NUMBER KF042843 (DOOR 10/15 FILTERCAKE).

Section 5 – Hazardous or Non-Hazardous Waste?

Please refer to Section 5 of the EQ Resource Guide for a list of waste codes

As determined by 40 CFR, Part 261 and State Rules: **Please list applicable waste code(s):**

5.1) Is this an EPA RCRA listed hazardous waste (F, K, P or U)? ☐ Yes ☒ No _____

5.2) Is this an EPA RCRA characteristic hazardous waste (D001-D043)? ☐ Yes ☒ No _____

5.3) Do any State Waste Codes apply? ☒ Yes ☐ No 029L

5.4) Is this waste intended for wastewater treatment? ☐ Yes* ☒ No

If you answered 'no' to 5.1, 5.2, and 5.3, please skip to Section 7. *If you answered 'yes' to 5.4, please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 6 – Hazardous Wastes

6.1) Does this waste exceed Land Disposal Restriction levels? ☐ Yes ☒ No

6.1a) If this waste stream is greater than 50% soil, does it meet the alternative soil treatment standards of 40 CFR 268.49? ☐ Yes ☒ No

6.1b) Does this waste contain greater than 50% debris, by volume? (Debris is greater than 2.5 inches in size.) ☐ Yes ☒ No

6.2) Is the waste an oxidizer (D001)? ☐ Yes ☒ No

6.3) Does this waste contain reactive cyanide ≥250 ppm (D003)? ☐ Yes ☒ No

6.4) Does this waste contain reactive sulfide ≥500 ppm (D003)?

6.5) Please indicate which constituent concentrations are below or above the regulatory level. Please indicate the basis used in the determination. Either "Below" or "Above" MUST be checked for each constituent.

Based On: ☒ Generator Knowledge ☒ Analysis* ☐ MSDS* *Please attach a copy.

Code		Regulatory Level TCLP (mg/l)	Concentration (if above)
D004	Arsenic	5	☐ Below ☐ Above ____
D005	Barium	100	☐ Below ☐ Above ____
D006	Cadmium	1	☐ Below ☐ Above ____
D007	Chromium	5	☐ Below ☐ Above ____
D008	Lead	5	☐ Below ☐ Above ____
D009	Mercury	0.2	☐ Below ☐ Above ____
D010	Selenium	1	☐ Below ☐ Above ____
D011	Silver	5	☐ Below ☐ Above ____
D012	Endrin	0.02	☐ Below ☐ Above ____
D013	Lindane	0.4	☐ Below ☐ Above ____
D014	Methoxychlor	10	☐ Below ☐ Above ____
D015	Toxaphene	0.5	☐ Below ☐ Above ____
D016	2,4-D	10	☐ Below ☐ Above ____
D017	2,4,5-TP (Silvex)	1	☐ Below ☐ Above ____
D018	Benzene	0.5	☐ Below ☐ Above ____
D019	Carbon Tetrachloride	0.5	☐ Below ☐ Above ____
D020	Chlordane	0.03	☐ Below ☐ Above ____
D021	Chlorobenzene	100	☐ Below ☐ Above ____
D022	Chloroform	6.0	☐ Below ☐ Above ____
D023	o-Cresol	200	☐ Below ☐ Above ____
D024	m-Cresol	200	☐ Below ☐ Above ____
D025	p-Cresol	200	☐ Below ☐ Above ____
D026	Cresols	200	☐ Below ☐ Above ____
D027	1,4-Dichlorobenzene	7.5	☐ Below ☐ Above ____
D028	1,2-Dicholoroethane	0.5	☐ Below ☐ Above ____
D029	1,1-Dichloroethylene	0.7	☐ Below ☐ Above ____
D030	2,4-Dinitrotoluene	0.13	☐ Below ☐ Above ____
D031	Heptachlor	0.008	☐ Below ☐ Above ____
D032	Hexachlorobenzene	0.13	☐ Below ☐ Above ____
D033	Hexachlorobutadiene	0.5	☐ Below ☐ Above ____
D034	Hexachloroethane	3.0	☐ Below ☐ Above ____
D035	Methyl Ethyl Ketone	200	☐ Below ☐ Above ____
D036	Nitrobenzene	2	☐ Below ☐ Above ____
D037	Pentachlorophenol	100	☐ Below ☐ Above ____
D038	Pyridine	5	☐ Below ☐ Above ____
D039	Tetrachloroethylene	0.7	☐ Below ☐ Above ____
D040	Trichloroethylene	0.5	☐ Below ☐ Above ____
D041	2,4,5-Trichlorophenol	400	☐ Below ☐ Above ____
D042	2,4,6-Trichlorophenol	2	☐ Below ☐ Above ____
D043	Vinyl Chloride	0.2	☐ Below ☐ Above ____

6.6) If this is a characteristic hazardous waste, does it contain underlying hazardous constituents? ☐ Yes ☒ No

If yes, please list the constituents in Section 11.

Section 7 – Non-Hazardous Wastes

For a complete list of non-hazardous waste codes, please refer to Section 7 of the EQ Resource Guide

			Please list applicable waste code:
7.1) Is this a Michigan non-hazardous liquid industrial waste?	☐ Yes	☒ No	
7.2) Is this a Universal waste?	☐ Yes	☒ No	
7.3) Is this a Recyclable Commodity? (e.g.: computer monitors, free mercury, etc.)	☐ Yes	☒ No	
7.4) Is this waste a recoverable petroleum product?	☐ Yes*	☒ No	
7.5) Is this waste used oil as defined by 40 CFR Part 279?	☐ Yes*	☒ No	

If you answered 'yes' to questions 7.4 or 7.5 please attach the Waste Characterization Report Addendum found in Section 7 of the EQ Resource Guide.

Section 8 – TSCA Information

8.1) What is the concentration of PCBs in the waste? ☒ None ☐ 0-5 ppm ☐ 6-49 ppm ☐ 50-499 ppm ☐ 500+ ppm

8.2) Does the waste contain PCB contamination from a source with a concentration ≥ 50 ppm? ☐ Yes ☒ No

If you answered "no" to 8.1 and 8.2, please skip to Section 9.

8.3) Has this waste been processed into a non-liquid form? ☐ Yes ☐ No

If yes, what was the concentration of PCBs prior to processing? ☐ N/A ☐ 0-499 ppm ☐ 500+ ppm

8.4) Is the non-liquid PCB waste in the form of soil, rags, debris, or other contaminated media? ☐ Yes ☐ No

8.5) Are you a PCB capacitor manufacturer or a PCB equipment manufacturer? ☐ Yes ☐ No

8.6) Has the PCB Article (e.g., transformer, hydraulic machine, PCB-contaminated electrical equipment) been drained/flushed of all PCBs and decontaminated in accordance with 40 CFR 761.60(b)? ☐ N/A ☐ Yes ☐ No

Section 9 – Clean Air Act Information

NESHAP SIC*		
2812	2836	2875
2813	2841	2879
2816	2842	2891
2819	2843	2892
2821	2844	2893
2822	2851	2895
2823	2861	2899
2824	2865	2911
2833	2869	3312
2834	2873	4953
2835	2874	9511

9.1) Is this waste subject to regulation under 40 CFR, Part 63, Subpart DD or 40 CFR, Part 264, Subpart CC (RCRA)? ☐ Yes ☒ No
(Does the waste contain >500 ppm Volatile Organic Hazardous Air Pollutants – VOHAP's or Volalite Organic Compounds – VOC's?)

For a complete list of VOHAP's, please see Section 11 of the EQ Resource Guide

9.2) Does this waste stream contain Benzene? ☐ Yes ☒ No

If you answered "no" to 9.2, please skip to Section 10.

9.3) Does the waste stream come from a facility with one of the SIC codes listed under the NESHAP? ☐ Yes ☐ No

9.4) Is the generating source of this waste stream a facility with Total Annual Benzene (TAB) ≥10 Mg/year? ☐ Yes ☐ No

For assistance in calculating the TAB, please see the TAB Worksheet in Section 9 of the EQ Resource Guide.

If you answered "no" to question 9.3 and 9.4, please skip to Section 10.

9.5) Does the waste contain >10% water? ☐ Yes ☐ No

9.6) What is the TAB quantity for your facility? _____ Mg/Year

9.7) Does the waste contain >1.0 mg/kg total Benzene? ☐ Yes ☐ No

9.8) What is the total Benzene concentration in your waste? _____ Percent or _____ ppmw.

(Do not use TCLP analytical results. Acceptable laboratory methods include 8020, 8240, 8260, 602 and 624.)

*For a list of NAICS codes, please refer to Section 9 of the EQ Resource Guide.

Section 10 – Fuel Blending Information

10.1) Is this waste intended for fuel blending? ☐ Yes* ☒ No

*If yes, Heat value (BTU/lb.) _____ Chlorine (%) _____ Water (%) _____ Solids (%) _____

10.2) Is this waste intended for reclamation? ☐ Yes ☐ No (5-Gallon Sample required for all reclaim waste streams)

Section 11 – Constituent Information

Please identify your waste constituents from these four categories: ***Underlying Hazardous Constituents (UHC's), Volatile Organic Hazardous Air Pollutants (VOHAP's), Volatile Organic Compounds (VOC's) and Toxic Release Inventory Constituents (TRI)***

Constituent	Concentration	UHC?		Constituent	Concentration	UHC?	
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No
		☐ Yes	☐ No			☐ Yes	☐ No

Please see Section 11 of the EQ Resource Guide for a list of UHC's, VOHAP's and VOC's. For a complete list of TRI constituents, please refer to 40 CFR 372.65.

Section 12 – Certification

I certify that all information (including attachments) is complete and factual and is an accurate representation of the known and suspected hazards, pertaining to the waste described herein. I authorize EQ's Resource Team to add supplemental information to the waste approval file, provided I am contacted and give verbal permission. I authorize EQ's Resource Team to obtain a sample from any waste shipment for purposes of verification and confirmation. I agree that, if EQ approves the waste described herein, all such wastes that are transported, delivered, or tendered to EQ by Generator or on Generator's behalf shall be subject to, and Generator shall be bound by, the attached Standard Terms and Conditions.

Generator Signature Christopher M Bell Printed Name CHRISTOPHER M BELL

Company DOUBLE EAGLE STEEL Title ENVIRONMENTAL ENGINEER Date 8/25/05

The generator's signature MUST appear on the EQ Waste Characterization Report. If the generator has authorized a third party to certify this document, a written notice (on generator letterhead) must accompany this submittal. Although the EQ Resource Team is authorized to make certain modifications to the information provided on this form, the addition or removal of waste codes and waste constituents must be documented by the generator.

LAB SAMPLE RESULTS

Generator: Double Eagle

Reference Number: 114442

SLUDGE

Report Date : 08/29/2005

TCLP Metals for Chem Fix

Analyte Name	Result	Units	LOQ	Analysis Date
Antimony	Less Than	ppm	0.50	08/26/2005
Arsenic	Less Than	ppm	0.50	08/26/2005
Barium	Less Than	ppm	1.0	08/26/2005
Beryllium	Less Than	ppm	0.50	08/26/2005
Cadmium	Less Than	ppm	0.10	08/26/2005
Chromium	1.6	ppm	0.50	08/26/2005
Lead	Less Than	ppm	0.50	08/26/2005
Mercury	Less Than	ppm	0.025	08/26/2005
Nickel	Less Than	ppm	0.50	08/26/2005
Selenium	Less Than	ppm	0.50	08/26/2005
Silver	Less Than	ppm	0.10	08/26/2005
Thallium	Less Than	ppm	0.10	08/26/2005

Treatability and Fingerprint

Analyte Name	Result	Units	LOQ	Analysis Date
Treatability and Fingerprint	Complete			08/26/2005

Validated By:

Raymond D. Landsberg
Manager, Lab Services

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

May 03, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05040748

Reference:

Dear IO Analytical

Dear Christopher McBee:

Clayton Group Services received 1 sample on
following report.

Enclosed is a copy of the Chain-of-Custody record
samples. Please note that any unused portion of the
after the date of this report, unless you have requeste

This material is confidential and is intended solely for
addressed. If this is received in error, please contact the below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan
Client Services Representative

cc:

CASE NARRATIVE

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05040748

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

The Total Organic Halogens analysis was subcontracted to Lancaster Laboratories, in Lancaster, PA. The actual method used was EPA 9023.

ANALYTICAL RESULTS

Date: *03-May-05*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	FILTER CAKE DE05001
Work Order No:	05040748	**Tag Number:**	
Project:		**Collection Date:**	4/18/2005
Lab ID:	05040748-001A	**Matrix:**	SOLID

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
FLASHPOINT; METHOD EPA 1010 (MODIFIED)							
Ignitability	>200	0		°F	1	4/25/2005	CLH
PCBS BY GC; METHOD EPA 8082							
Aroclor 1016	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1221	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1232	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1242	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1248	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1254	ND	330		µg/Kg	1	4/22/2005	BVP
Aroclor 1260	ND	330		µg/Kg	1	4/22/2005	BVP
TOTAL ORGANIC HALOGENS; METHOD EPA 9076							
Total Organic Halides (TOX)	1,900	90		mg/Kg-dry	1	4/28/2005	SUB
PAINT FILTER LIQUIDS TEST; METHOD EPA 9095A							
Free Liquid	Negative	0		Pos/Neg	1	5/2/2005	RAS
PH, SOIL OR WASTE; METHOD EPA 9045C							
pH	2.3	1.0		pH Units	1	4/27/2005 5:45:00 PM	RAS
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/Kg	1	4/21/2005	HML
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/Kg	1	4/21/2005	HML

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

ANALYTICAL RESULTS

Date: *03-May-05*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	FILTER CAKE DE05001
Work Order No:	05040748	**Tag Number:**	
Project:		**Collection Date:**	4/18/2005
Lab ID:	05040748-001B	**Matrix:**	LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
ICP METALS;LEACHATE: METHOD EPA 1311/6010B							
Arsenic	ND	0.10		mg/L	1	4/26/2005	CAW
Barium	0.81	0.10		mg/L	1	4/26/2005	CAW
Cadmium	ND	0.050		mg/L	1	4/26/2005	CAW
Chromium	0.54	0.10		mg/L	1	4/26/2005	CAW
Lead	ND	0.10		mg/L	1	4/26/2005	CAW
Selenium	ND	0.20		mg/L	1	4/26/2005	CAW
Silver	ND	0.020		mg/L	1	4/26/2005	CAW
MERCURY; LEACHED: METHOD EPA 1311/7470A							
Mercury	ND	0.0010		mg/L	1	4/26/2005	RS

Qualifiers:

ND - Not Detected at the Reporting Limit (RL)
J - Analyte detected below the Reporting Limit
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
E - Value above quantitation range
T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT

Method Blank

Sample ID: **MB-18715** Batch ID: **18715** Units: **mg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_PE3C_050426A** SeqNo: **767516**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	ND	0.1									
Barium	ND	0.1									
Cadmium	ND	0.05									
Chromium	ND	0.1									
Lead	ND	0.1									
Selenium	ND	0.2									
Silver	ND	0.02									

Sample ID: **MB-18716** Batch ID: **18716** Units: **µg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_CE5E_050426C** SeqNo: **767312**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	ND	0.2									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: **MB-18668** Batch ID: **18668** Units: **µg/Kg** Analysis Date: **04/22/2005** Prep Date: **04/21/2005**
Client ID: Run ID: **PP_HP4D_050422A** SeqNo: **766014**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	ND	330									
Aroclor 1221	ND	330									
Aroclor 1232	ND	330									
Aroclor 1242	ND	330									
Aroclor 1248	ND	330									
Aroclor 1254	ND	330									
Aroclor 1260	ND	330									
Surr: Decachlorobiphenyl	14	0	16.7	0	83.8	20.8	188	0			
Surr: Tetrachloro-m-xylene	12	0	16.7	0	71.9	6.8	140	0			

Sample ID: **MB-R65740** Batch ID: **R65740** Units: **pH Units** Analysis Date: **04/27/2005 5:43:00 PM** Prep Date:
Client ID: Run ID: **WC_OR17Q_050427A** SeqNo: **768181**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
pH	6.2	1									

Sample ID: **MB-R65477** Batch ID: **R65477** Units: **mg/Kg** Analysis Date: **04/21/2005** Prep Date:
Client ID: Run ID: **WC_PE10J_050421A** SeqNo: **765392**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	ND	0.1									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Method Blank

Sample ID: **MB-R65476** Batch ID: **R65476** Units: **mg/Kg** Analysis Date: **04/21/2005** Prep Date:
Client ID: Run ID: **WC_MA7G_050421A** SeqNo: **765383**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	ND	100									

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: **LCS-18715** Batch ID: **18715** Units: **mg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_PE3C_050426A** SeqNo: **767517**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.88	0.1	5	0	97.6	84	113	0			
Barium	4.88	0.1	5	0	97.6	87.6	112	0			
Cadmium	4.87	0.05	5	0	97.4	86.9	113	0			
Chromium	4.79	0.1	5	0	95.8	84.6	112	0			
Lead	4.8	0.1	5	0	96	86.2	111	0			
Selenium	4.97	0.2	5	0	99.4	82	114	0			
Silver	4.97	0.02	5	0	99.4	77.9	118	0			

Sample ID: **LCS-18716** Batch ID: **18716** Units: **µg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_CE5E_050426C** SeqNo: **767313**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.76	0.2	2	0	88	75.3	124	0			

Sample ID: **LCS-18668** Batch ID: **18668** Units: **µg/Kg** Analysis Date: **04/22/2005** Prep Date: **04/21/2005**
Client ID: Run ID: **PP_HP4D_050422A** SeqNo: **766015**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	225.3	330	333	0	67.7	28.9	142	0			J
Aroclor 1260	250.7	330	333	0	75.3	38.7	148	0			J
Surr: Decachlorobiphenyl	14	0	16.7	0	83.8	20.8	188	0			
Surr: Tetrachloro-m-xylene	10.33	0	16.7	0	61.9	6.8	140	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: **LCS-R65477** Batch ID: **R65477** Units: **mg/Kg** Analysis Date: **04/21/2005** Prep Date:
Client ID: Run ID: **WC_PE10J_050421A** SeqNo: **765393**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Cyanide	6.8	0.1	100	0	6.8	1.41	13.3	0			

Sample ID: **LCS-R65476** Batch ID: **R65476** Units: **mg/Kg** Analysis Date: **04/21/2005** Prep Date:
Client ID: Run ID: **WC_MA7G_050421A** SeqNo: **765384**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Reactive Sulfide	70.52	100	91.38	0	77.2	4.19	106	0			J

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: *03-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: **05040691-002B-MS** Batch ID: **18715** Units: **mg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_PE3C_050426A** SeqNo: **767520**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.93	0.1	5	0	98.6	82.5	120	0			
Barium	5.23	0.1	5	0.314	98.3	81.1	116	0			
Cadmium	4.89	0.05	5	0	97.8	81.6	115	0			
Chromium	4.87	0.1	5	0	97.4	80.9	112	0			
Lead	4.83	0.1	5	0	96.6	80.5	113	0			
Selenium	4.92	0.2	5	0	98.4	81.3	120	0			
Silver	4.99	0.02	5	0	99.8	70.1	123	0			

Sample ID: **05040691-002B-MSD** Batch ID: **18715** Units: **mg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_PE3C_050426A** SeqNo: **767521**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Arsenic	4.89	0.1	5	0	97.8	82.5	120	4.93	0.815	8.61	
Barium	5.17	0.1	5	0.314	97.1	81.1	116	5.23	1.15	6.14	
Cadmium	4.78	0.05	5	0	95.6	81.6	115	4.89	2.28	5.93	
Chromium	4.83	0.1	5	0	96.6	80.9	112	4.87	0.825	5.53	
Lead	4.74	0.1	5	0	94.8	80.5	113	4.83	1.88	5.79	
Selenium	4.94	0.2	5	0	98.8	81.3	120	4.92	0.406	10.6	
Silver	5.02	0.02	5	0	100	70.1	123	4.99	0.599	10.2	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Sample Matrix Spike

Sample ID: **05040978-001A-MS** Batch ID: **18716** Units: **µg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_CE5E_050426C** SeqNo: **767322**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.89	0.2	2	0	94.5	69.7	126	0			

Sample ID: **05040978-001A-MSD** Batch ID: **18716** Units: **µg/L** Analysis Date: **04/26/2005** Prep Date: **04/26/2005**
Client ID: Run ID: **ME_CE5E_050426C** SeqNo: **767323**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Mercury	1.81	0.2	2	0	90.5	69.7	126	1.89	4.32	21.8	

Sample ID: **05040748-001AMS** Batch ID: **18668** Units: **µg/Kg** Analysis Date: **04/22/2005** Prep Date: **04/21/2005**
Client ID: **FILTER CAKE DE05001** Run ID: **PP_HP4D_050422A** SeqNo: **766019**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	227.7	330	333	0	68.4	13	148	0			J
Aroclor 1260	270.7	330	333	0	81.3	19.1	155	0			J
Surr: Decachlorobiphenyl	15	0	16.7	0	89.8	8.72	160	0			
Surr: Tetrachloro-m-xylene	9.667	0	16.7	0	57.9	0.5	132	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Sample ID: **05040748-001AMSD** Batch ID: **18668** Units: **µg/Kg** Analysis Date: **04/22/2005** Prep Date: **04/21/2005**
Client ID: **FILTER CAKE DE05001** Run ID: **PP_HP4D_050422A** SeqNo: **766020**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Aroclor 1016	225.7	330	333	0	67.8	13	148	227.7	0.882	75.2	J
Aroclor 1260	266.7	330	333	0	80.1	19.1	155	270.7	1.49	70.3	J
Surr: Decachlorobiphenyl	14.67	0	16.7	0	87.8	8.72	160	15	2.25	0	
Surr: Tetrachloro-m-xylene	10.33	0	16.7	0	61.9	0.5	132	9.667	6.67	0	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton Group Services

Date: 03-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05040748
Project:
Analysis: PCBs; Soil: Method 8082

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID	CL10BZ2	XYL2456CLM						
05040630-001A	71.9	63.9						
05040641-008A	67.9	67.9						
05040748-001A	75.8	65.9						
05040748-001AMS	89.8	57.9						
05040748-001AMS	87.8	61.9						
05040778-001A	39.9	35.9						
05040778-002A	55.9	47.9						
LCS-18668	83.8	61.9						
MB-18668	83.8	71.9						

Acronym		Surrogate	QC Limits
CL10BZ2	=	Decachlorobiphenyl	8.72-160
XYL2456CLM	=	Tetrachloro-m-xylene	0.5-132

*** Surrogate recovery outside acceptance limits**

REQUEST FOR LABORATORY ANALYTICAL SERVICES

Clayton GROUP SERVICES

IMPORTANT
Date Results Requested: _____
Rush Charges Authorized? ☐ Yes ☐ No
☐ Fax or ☐ E-mail Results
E-mail address: _____

Page ___ ___

For Clayton Use Only
Clayton Lab Project No.
05040748

REPORT RESULTS TO
Name CHRISTOPHER MCBEE | Client Job No.
Company Double Eagle | Dept. ENVIRONMENTAL
Mailing Address 3000 Miller
City, State, Zip Dearborn, MI
Telephone No. | FAX No.

SEND INVOICE TO
Purchase Order No.
Name
Company | Dept.
Address
City, State, Zip

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

* Explanation of Preservative

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TCLP MEM	RCT	TOTAL MB	TOX	FOR LAB USE ONLY
FILTER CAKE-DE0501	4/18		SOLID		2	X	X	X	X	

CHAIN OF CUSTODY

Collected by: JOE CHALLOY (print) | Collector's Signature:
Relinquished by: CHRIS McBee | Date/Time 4/19 | Received by: 4/19/05 | Date/Time 12:30
Relinquished by: | Date/Time | Received by: | Date/Time
Method of Shipment: | Received at Lab by: | Date/Time 4/19
Authorized by: Christopher McBee (Client Signature MUST Accompany Request) | Date 4/19/05 | Sample Condition Upon Receipt: ☑ Acceptable ☐ Other (explain)

2.4°C

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

10.9
8.5

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

May 11, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05050236

Reference: Filter Cake

Dear Christopher McBee:

Clayton Group Services received 1 sample on 5/6/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

CASE NARRATIVE

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project: Filter Cake

Work Order No 05050236

Unless otherwise noted below, all quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results.

Analytical Comments for Method 8270L, sample LCS-18910: Please note that the laboratory control spike (LCS) recovery of one or more analytes was above statistical limits. The matrix spike/duplicate (MS/MSD) passed the LCS criteria. The results are not affected.

ANALYTICAL RESULTS

Clayton GROUP SERVICES

Date: *11-May-05*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	FILTER CAKE
Work Order No:	05050236	**Tag Number:**	
Project:	Filter Cake	**Collection Date:**	5/6/2005 12:00:00 PM
Lab ID:	05050236-001B	**Matrix:**	LEACHATE

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
GC/MS TCLP VOLATILES; METHOD EPA 1311/8260B							
Benzene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
2-Butanone	ND	4.0		mg/L	200	5/10/2005 8:31:00 PM	DRS
Carbon tetrachloride	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Chlorobenzene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Chloroform	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
1,2-Dichloroethane	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
1,1-Dichloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Tetrachloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Trichloroethene	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
Vinyl chloride	ND	0.20		mg/L	200	5/10/2005 8:31:00 PM	DRS
GCMS TCLP SEMIVOLATILES; METHOD EPA 1311/8270C							
1,4-Dichlorobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4-Dinitrotoluene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachlorobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachlorobutadiene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Hexachloroethane	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Nitrobenzene	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Pentachlorophenol	ND	0.10		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Pyridine	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4,5-Trichlorophenol	ND	0.25		mg/L	0.5	5/10/2005 9:06:00 PM	LL
2,4,6-Trichlorophenol	ND	0.025		mg/L	0.5	5/10/2005 9:06:00 PM	LL
Cresols, Total	ND	0.25		mg/L	0.5	5/10/2005 9:06:00 PM	LL

Qualifiers:

ND - Not Detected at the Reporting Limit (RL).

J - Analyte detected below the Reporting Limit

B - Analyte detected in the associated Method Blank

* - Value exceeds Maximum Contaminant Level

S - Spike Recovery outside accepted recovery limits

R - RPD outside accepted recovery limits

E - Value above quantitation range

T - Tentatively Identified Compound (TIC)

Clayton Group Services

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: **05050000-BLK6** Batch ID: **R66313** Units: **mg/L** Analysis Date: **5/10/2005 5:56:00 PM** Prep Date:

Client ID: Run ID: **MS_HP10J_050506B** SeqNo: **774702**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Benzene	ND	0.02									
2-Butanone	ND	0.4									
Carbon tetrachloride	ND	0.02									
Chlorobenzene	ND	0.02									
Chloroform	ND	0.02									
1,2-Dichloroethane	ND	0.02									
1,1-Dichloroethene	ND	0.02									
Tetrachloroethene	ND	0.02									
Trichloroethene	ND	0.02									
Vinyl chloride	ND	0.02									
Surr: 4-Bromofluorobenzene	0.9912	0	1	0	99.1	82.7	115	0			
Surr: 1,2-Dichloroethane-d4	0.9998	0	1	0	100	74.4	120	0			
Surr: Toluene-d8	0.9814	0	1	0	98.1	81.8	118	0			
Surr: Pentafluorobenzene	1.04	0	1	0	104	81.9	122	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: **MB-18910** Batch ID: **18910** Units: **mg/L** Analysis Date: **5/10/2005 11:04:00 PM** Prep Date: **5/10/2005**
Client ID: Run ID: **MS_HP5E_050510B** SeqNo: **774616**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	ND	0.025									
2,4-Dinitrotoluene	ND	0.025									
Hexachlorobenzene	ND	0.025									
Hexachlorobutadiene	ND	0.025									
Hexachloroethane	ND	0.025									
Nitrobenzene	ND	0.025									
Pentachlorophenol	ND	0.1									
Pyridine	ND	0.025									
2,4,5-Trichlorophenol	ND	0.25									
2,4,6-Trichlorophenol	ND	0.025									
Cresols, Total	ND	0.25									
Surr: 2,4,6-Tribromophenol	0.8274	0	0.75	0	110	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.4705	0	0.5	0	94.1	21.9	111	0			
Surr: 2-Fluorophenol	0.6192	0	0.75	0	82.6	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4479	0	0.5	0	89.6	24.1	102	0			
Surr: Phenol-d5	0.65	0	0.75	0	86.7	1.91	101	0			
Surr: Terphenyl-d14	0.6551	0	0.5	0	131	33.5	126	0			S

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Method Blank

Sample ID: **MB-18910 FL1** Batch ID: **18910** Units: **mg/L** Analysis Date: **5/10/2005 5:09:00 PM** Prep Date: **5/10/2005**
Client ID: Run ID: **MS_HP5E_050510B** SeqNo: **774607**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	ND	0.025									
2,4-Dinitrotoluene	ND	0.025									
Hexachlorobenzene	ND	0.025									
Hexachlorobutadiene	ND	0.025									
Hexachloroethane	ND	0.025									
Nitrobenzene	ND	0.025									
Pentachlorophenol	ND	0.1									
Pyridine	ND	0.025									
2,4,5-Trichlorophenol	ND	0.25									
2,4,6-Trichlorophenol	ND	0.025									
Cresols, Total	ND	0.25									
Surr: 2,4,6-Tribromophenol	0.725	0	0.75	0	96.7	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.408	0	0.5	0	81.6	21.9	111	0			
Surr: 2-Fluorophenol	0.5405	0	0.75	0	72.1	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4008	0	0.5	0	80.2	24.1	102	0			
Surr: Phenol-d5	0.5353	0	0.75	0	71.4	1.91	101	0			
Surr: Terphenyl-d14	0.5256	0	0.5	0	105	33.5	126	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

Clayton Group Services

Date: *11-May-05*

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Laboratory Control Spike

Sample ID: **LCS-18910** Batch ID: **18910** Units: **mg/L** Analysis Date: **5/10/2005 5:49:00 PM** Prep Date: **5/10/2005**
Client ID: Run ID: **MS_HP5E_050510B** SeqNo: **774608**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.3343	0.025	0.5	0	66.9	20.2	68.6	0			
2,4-Dinitrotoluene	0.5467	0.025	0.5	0	109	48.9	115	0			
Hexachlorobenzene	0.4943	0.025	0.5	0	98.9	42.9	124	0			
Hexachlorobutadiene	0.4283	0.025	0.5	0	85.7	11.2	82.6	0			S
Hexachloroethane	0.3874	0.025	0.5	0	77.5	12.1	71	0			S
Nitrobenzene	0.4534	0.025	0.5	0	90.7	28.5	94	0			
Pentachlorophenol	0.4759	0.1	0.5	0	95.2	20.4	122	0			
Pyridine	0.2898	0.025	0.5	0	58	0.5	66.2	0			
2,4,5-Trichlorophenol	0.4814	0.25	0.5	0	96.3	31.8	103	0			
2,4,6-Trichlorophenol	0.4899	0.025	0.5	0	98	32.2	100	0			
Cresols, Total	0.831	0.25	1	0	83.1	32.5	94	0			
Surr: 2,4,6-Tribromophenol	0.911	0	0.75	0	121	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.5042	0	0.5	0	101	21.9	111	0			
Surr: 2-Fluorophenol	0.5504	0	0.75	0	73.4	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.4539	0	0.5	0	90.8	24.1	102	0			
Surr: Phenol-d5	0.5871	0	0.75	0	78.3	1.91	101	0			
Surr: Terphenyl-d14	0.6403	0	0.5	0	128	33.5	126	0			S

Please note that the laboratory control spike (LCS) recovery of one or more analytes was above statistical limits. The matrix spike/duplicate (MS/MSD) passed the LCS criteria. The results are not affected.

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Surr: Pentafluorobenzene	47.77	0	50	0	95.5	81.7	135	52.41	9.26	6.63	R

Sample ID: **05050236-001BMS** Batch ID: **18910** Units: **mg/L** Analysis Date: **5/10/2005 9:45:00 PM** Prep Date: **5/10/2005**
Client ID: **FILTER CAKE** Run ID: **MS_HP5E_050510B** SeqNo: **774614**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.275	0.025	0.5	0	55	0.5	123	0			
2,4-Dinitrotoluene	0.4528	0.025	0.5	0	90.6	12.3	142	0			
Hexachlorobenzene	0.4274	0.025	0.5	0	85.5	0.5	157	0			
Hexachlorobutadiene	0.3262	0.025	0.5	0	65.2	0.5	122	0			
Hexachloroethane	0.3026	0.025	0.5	0	60.5	2.4	109	0			
Nitrobenzene	0.3543	0.025	0.5	0	70.9	15.8	125	0			
Pentachlorophenol	0.4315	0.1	0.5	0	86.3	0.5	156	0			
Pyridine	0.2477	0.025	0.5	0	49.5	0.5	110	0			
2,4,5-Trichlorophenol	0.406	0.25	0.5	0	81.2	5.88	137	0			
2,4,6-Trichlorophenol	0.3786	0.025	0.5	0	75.7	3.3	140	0			
Cresols, Total	0.6342	0.25	1	0	63.4	7.02	134	0			
Surr: 2,4,6-Tribromophenol	0.7529	0	0.75	0	100	22.2	123	0			
Surr: 2-Fluorobiphenyl	0.366	0	0.5	0	73.2	21.9	111	0			
Surr: 2-Fluorophenol	0.4371	0	0.75	0	58.3	7.54	91.2	0			
Surr: Nitrobenzene-d5	0.3448	0	0.5	0	69	24.1	102	0			
Surr: Phenol-d5	0.4696	0	0.75	0	62.6	1.91	101	0			
Surr: Terphenyl-d14	0.5467	0	0.5	0	109	33.5	126	0			

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake

QC SUMMARY REPORT
Sample Matrix Spike Duplicate

Sample ID: **05050236-001BMSD** Batch ID: **18910** Units: **mg/L** Analysis Date: **5/10/2005 10:24:00 PM** Prep Date: **5/10/2005**
Client ID: **FILTER CAKE** Run ID: **MS_HP5E_050510B** SeqNo: **774615**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
1,4-Dichlorobenzene	0.2262	0.025	0.5	0	45.2	0.5	123	0.275	19.5	58.3	
2,4-Dinitrotoluene	0.4153	0.025	0.5	0	83.1	12.3	142	0.4528	8.63	56.4	
Hexachlorobenzene	0.3955	0.025	0.5	0	79.1	0.5	157	0.4274	7.77	59.7	
Hexachlorobutadiene	0.2518	0.025	0.5	0	50.4	0.5	122	0.3262	25.7	61.6	
Hexachloroethane	0.2473	0.025	0.5	0	49.5	2.4	109	0.3026	20.1	70.2	
Nitrobenzene	0.2854	0.025	0.5	0	57.1	15.8	125	0.3543	21.5	56.9	
Pentachlorophenol	0.426	0.1	0.5	0	85.2	0.5	156	0.4315	1.28	71	
Pyridine	0.2222	0.025	0.5	0	44.4	0.5	110	0.2477	10.8	98.6	
2,4,5-Trichlorophenol	0.3051	0.25	0.5	0	61	5.88	137	0.406	28.4	54.5	
2,4,6-Trichlorophenol	0.2939	0.025	0.5	0	58.8	3.3	140	0.3786	25.2	54	
Cresols, Total	0.5155	0.25	1	0	51.5	7.02	134	0.6342	20.7	25	
Surr: 2,4,6-Tribromophenol	0.6738	0	0.75	0	89.8	22.2	123	0.7529	11.1	24.9	
Surr: 2-Fluorobiphenyl	0.285	0	0.5	0	57	21.9	111	0.366	24.9	46.2	
Surr: 2-Fluorophenol	0.3526	0	0.75	0	47	7.54	91.2	0.4371	21.4	50	
Surr: Nitrobenzene-d5	0.2827	0	0.5	0	56.5	24.1	102	0.3448	19.8	64.2	
Surr: Phenol-d5	0.3843	0	0.75	0	51.2	1.91	101	0.4696	20	32	
Surr: Terphenyl-d14	0.5321	0	0.5	0	106	33.5	126	0.5467	2.72	22.8	

Qualifiers:
ND - Not Detected at the Reporting Limit
J - Analyte detected below Reporting Limit
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
B - Analyte detected in the associated Method Blank

Clayton GROUP SERVICES

Clayton Group Services

Date: 11-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake
Analysis: Volatile Organics; Leached: Method 8260B

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID		BR4FBZ	BZMED8	DCA12D4				
05050000-BLK6		99.1	98.1	100				
05050236-001B		92.8	96.0	101				

Acronym		Surrogate	QC Limits
	=	Pentafluorobenzene	81.7-135
BR4FBZ	=	4-Bromofluorobenzene	87.2-110
BZMED8	=	Toluene-d8	90-111
DCA12D4	=	1,2-Dichloroethane-d4	80.5-119

*** Surrogate recovery outside acceptance limits**

Clayton Group Services

Date: 11-May-05

CLIENT: DOUBLE EAGLE STEEL COATING CO
Work Order: 05050236
Project: Filter Cake
Analysis: Semivolatile Organics; Leached: Method 8270C

QC SUMMARY REPORT
SURROGATE RECOVERIES

Sample ID	NO2BZD5	PH246BR	PH2F	PHEN2F	PHEND14	PHENOLD5		
05050194-002B	126 *	231 *	66.4	70.9	100	129 *		
05050194-003B	55.5	81.3	48.6	56.4	103	48.5		
05050199-006B	50.6	88.0	46.6	53.7	91.1	50.6		
05050199-007B	57.9	122	50.0	62.1	132 *	52.1		
05050236-001B	55.4	65.2	47.5	52.3	97.6	50.1		
05050236-001BMS	69.0	100	58.3	73.2	109	62.6		
05050236-001BMS	56.5	89.8	47.0	57.0	106	51.2		
LCS-18910	90.8	121	73.4	101	128 *	78.3		
MB-18910	89.6	110	82.6	94.1	131 *	86.7		
MB-18910 FL1	80.2	96.7	72.1	81.6	105	71.4		

Acronym		Surrogate	QC Limits
NO2BZD5	=	Nitrobenzene-d5	24.1-102
PH246BR	=	2,4,6-Tribromophenol	22.2-123
PH2F	=	2-Fluorophenol	7.54-91.2
PHEN2F	=	2-Fluorobiphenyl	21.9-111
PHEND14	=	Terphenyl-d14	33.5-126
PHENOLD5	=	Phenol-d5	1.91-101

*** Surrogate recovery outside acceptance limits**

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: 5/10/05
Rush Charges Authorized? ☒ Yes ☐ No
☐ Fax or ☒ E-mail Results
E-mail address:

Page ___ of ___
For Clayton Use Only
Clayton Lab Project No.
05050236

REPORT RESULTS TO
Name: C. McKee
Company: Double Eagle
Mailing Address: 3000 Mt. Elliott
City, State, Zip: Dearborn, MI 48120
Telephone No.: 313 303 1902 FAX No.:
Client Job No.:
Dept.:

SEND INVOICE TO
Purchase Order No.:
Name:
Company:
Dept.:
Address:
City, State, Zip:

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

* Explanation of Preservative

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	1 Cup Vol	1 Cup SVOC	FOR LAB USE ONLY
Filter Cake	5/6	12:00	Solid			X	X	

CHAIN OF CUSTODY

Collected by: C. McKee (print) Collector's Signature:
Relinquished by: C. McKee Date/Time 5/6 12:00 Received by: Date/Time 5/6 12:00
Relinquished by: Date/Time Received by: Date/Time
Method of Shipment: Received at Lab by: Date/Time 5/6
Authorized by: C. McKee Date 5/6/05 (Client Signature **MUST** Accompany Request)
Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain) 212

7.1

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48
(800) 806-56
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

Exhibit M

Approval # 072505-N

Date 7/25/05

Pricing _____

_____

By _____

USHER

OIL COMPANY

.. safely recycling since 1930

9000 ROSELAWN
DETROIT, MICHIGAN 48204
Phone (313) 834-7055 Fax (313) 834-7036

10009280

EPA ID# MID-016-985-814

USED OIL / WASTEWATER PROFILE

Please complete all applicable sections and return with a representative sample.

SECTION 1 ***GENERATOR INFORMATION***

Generator DOUBLE EAGLE ID# MID-981-092-190

Address 3000 MILLER ROAD

City DEARBORN State MI Zip 48120

Contact CHRISTOPHER McGEE Phone 313-203-9829 Fax 313-203-9705

SECTION 2 ***TRANSPORTER INFORMATION***

Transporter USHER ID# ___-___-___-___

Address _____

City _____ State _____ Zip _____

Contact _____ Phone _____ Fax _____

SECTION 3 ***BILLING INFORMATION***

Customer SAME Phone _____

Address _____ Fax _____

City _____ State _____ Zip _____

Contact _____

SECTION 4 ***WASTE DESCRIPTION***

Common Name DIESEL FUEL Waste Code(s) 021L

Process Generating Waste EXCESS FUEL - NO LONGER REQUIRED BECAUSE EQUIPMENT Removed From Service

_____

_____

Shipping Volume 250-500 gal Frequency 1x/yr Bulk X Drums _____

Generator's Signature Christopher McGee Date 7/25/05

SECTION 5 PHYSICAL CHARACTERISTICS

Color:_____ Odor: None ☐ Mild ☒ Fuel Strong ☐

Physical State: Liquid ☒ Solid ☐ Sludge ☐

Layer: Single Phase ☒ Bi-Phase ☐ Multi-Phase ☐

Density: 1 g/cc or lbs/gal Flash Point: <140°F ☒ 140 - 200°F ☐ >200°F ☐

pH: N/A CM <2.0 ☐ 2.0 – 4.0 ☐ 4.1 - 10.0 ☐ 10.1 - 12.5 ☐ >12.5 ☐

SECTION 6 USED OIL RECLAMATION

Is this material regulated as a **"used oil"** by 40 CFR 279 and Michigan Act 451 Part 111? Yes ☐ No ☒

If yes, complete this section. If no, skip to Section 7.

Composition: Oil_____% Water_____% Solids_____%

Total Halogens_____. If >1,000 ppm additional, F scan analysis or MSDS is required.

Certification of Used Oil Stream (please check all that apply):

_____ The used oil stream has been mixed with hazardous waste, which was generated by a conditionally exempt small quantity generator. See 40 C.F.R. 261.5; Mich. Admin. Code R 299.9205. (CESQG Certification Required)

_____ The used oil stream contains polychlorinated biphenyl (PCB's). PCB's_____ppm

_____ The used oil stream has been mixed with a characteristic hazardous waste. See 40 C.F.R. Part 261 Subpart C; Mich. Admin. Code R 299.9212.

_____ The used oil stream contains chlorinated paraffins. (Material Safety Data Sheet Required)

_____ The used oil stream contains halogenated chemicals, which are not hazardous wastes. Please specify: _____.

I, hereby, certify that this used oil stream has not been mixed with, or does not contain, hazardous waste regulated under the federal Reaource Conservation and Recovery Act 40 CFR Part 261 or Michigan Act 451 Part 111.

Generator's Signature _____ Date_____

Print Name_____ Title_____

Please proceed to Section 7.

SECTION 7 WASTE CHARACTERIZATION

Attach laboratory analysis, MSDS or other supporting documentation.

			Waste Code(s)
1. Does the waste meet any F, K, P or U listing description before or after treatment?	☒ No	☐ Yes	
2. Does the waste exhibit the characteristic of Ignitability?	☐ No	☒ Yes	D001
3. Does the waste exhibit the characteristic of Corrosivity?	☒ No	☐ Yes	
4. Does the waste exhibit the characteristic of Reactivity? (e.g. Cyanide > 250 ppm or Sulfide > 500 ppm.)	☒ No	☐ Yes	
5. Does the waste exhibit a TCLP Constituent above the characteristic limit ? (see section 9)	☒ No	☐ Yes	
6. Is this a non-hazardous liquid industrial waste regulated under Michigan's Act 451 (Part 121)?	☒ No	☒ Yes	021L
7. Does the waste contain PCB's >1.0 ppm or is it derived from a source containing >50 ppm?	☒ No	☐ Yes	
8. Does the facility generate any hazardous waste?	☐ No	☒ Yes	
9. If yes, are they segregated from this waste stream?	☐ N/A	☒ Yes	
10. Would the waste have to meet "Categorical Discharge Limitations" specified in 40 CFR Parts 402 through 699, if treated on-site?	☒ No	☐ Yes	
11. Does the waste contain VOC's >500 ppm/wt.	☐ No	☐ Yes	
12. Does the waste contain total Mercury >260 ppm?	☒ No	☐ Yes	
13. Is this waste generated as a result of UST activity?	☒ No	☐ Yes	
14. Is this a fuel (gasoline or diesel) regulated recycled petroleum product (RPP)?	☐ No	☒ Yes	

SECTION 8 GENERATOR CERTIFICATION

I certify, to the best of my knowledge, that I am familiar with this waste stream through analyses and/or knowledge, and that all information submitted is true, accurate and complete and that all known or suspected hazards have been disclosed.

Christopher McBee — ENVIRONMENTAL ENGINEER — 7/25/05

Generator's Signature | Title | Date

SECTION 9 TCLP CERTIFICATION

>-Mark the "Yes" column to indicate which TCLP testing has been conducted. (Attach lab results).
>-For those constituents not tested, mark "No" and sign the certification provided.
>-Either "Yes" or "No" MUST be checked for each and every constituent.

TCLP REGULATORY ACTION LEVELS — CONSTITUENT TESTING CONDUCTED OR CERTIFICATION

	mg/L	YES	NO	CERTIFICATION
ZHE ORGANICS*				
D018 Benzene	0.5	☐	☒	"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"
D019 Carbon Tetrachloride	0.5	☐	☒	
D021 Chlorobenzene	100.0	☐	☒	
D022 Chloroform	6.0	☐	☒	
D028 1,2-Dichloroethane	0.5	☐	☒	
D029 1,1-Dichloroethylene	0.7	☐	☒	
D035 Methyl Ethyl Ketone	200.0	☐	☒	Signed:
D039 Tetrachloroethylene	0.7	☐	☒	C McBee 7/25/05
D040 Trichloroethylene	0.5	☐	☒	
D043 Vinyl Chloride	0.2	☐	☒	
METALS*				
D004 Arsenic	5.0	☐	☒	"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"
D005 Barium	100.0	☐	☒	
D006 Cadmium	1.0	☐	☒	
D007 Chromium	5.0	☐	☒	
D008 Lead	5.0	☐	☒	
D009 Mercury	0.2	☐	☒	
D010 Selenium	1.0	☐	☒	Signed:
D011 Silver	5.0	☐	☒	C McBee 7/25/05
001D Copper	100.0	☐	☒	
003D Zinc	500.0	☐	☒	
ACID EXTRACTABLES*				
D023 o-Cresol	200.0	☐	☒	"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"
D024 m-Cresol	200.0	☐	☒	
D025 p-Cresol	200.0	☐	☒	
D026 Cresol	200.0	☐	☒	
D037 Pentachlorophenol	100.0	☐	☒	
D041 2,4,5-Trichlorophenol	400.0	☐	☒	
D042 2,4,6-Tricholrophenol	2.0	☐	☒	Signed: C McBee 7/25/05
BASE NEUTRAL EXTRACTABLES*				
D027 1,4-Dichlorobenzene	7.5	☐	☒	"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"
D030 2,4-Dinitrotoluene	0.13	☐	☒	
D032 Hexachlorobenzene	0.13	☐	☒	
D033 Hexachlorobutadiene	0.5	☐	☒	
D034 Hexachloroethane	3.0	☐	☒	
D036 Nitrobenzene	2.0	☐	☒	
D038 Pyridine	5.0	☐	☒	Signed: C McBee 7/25/05
PESTICIDES*				
D020 Chlordane	0.03	☐	☒	"Based upon my knowledge of the waste And the process generating the waste, These constituents are not present in the Waste above hazardous classification Levels"
D012 Endrin	0.02	☐	☒	
D031 Heptachlor (& itshydroxide)	0.008	☐	☒	
D013 Lindane	0.4	☐	☒	
D014 Methoxychlor	10.0	☐	☒	
D015 Toxaphene	0.5	☐	☒	Signed: C McBee 7/25/05
HERBICIDES*				
D016 2,4-D	10.0	☒	☐	Signed: C McBee 7/26/05
D017 2,4,5-TP (Silvex)	1.0	☒	☐	

DATE 08/02/2005

TIME 12:02 PM

USHER OIL COMPANY

... safely recycling since 1930

9000 ROSELAWN
DETROIT, MICHIGAN 48204
(313) 834-7055

NO. 133558

INCOMING MATERIALS

TRANS. USHER TRANSPORTATION, DRIVER Zack GEN. DOUBLE EAGLE

MANIFEST NUMBERS 10009280

MANIFEST DESCRIPTION OTHER GALS. 300

CONTENTS PERCENTAGE:

OIL 99

WATER

RAG LAYER 0

SOLIDS 1

CHLORINE 54 ppm

ZINC ppm

PH=

FLASH POINT 141 F F

TANK NO. 6

DRIVER

PLANT OPER.

DIESEL FUEL

2.5 INCHES X 160

DYNECOL

DYNECOL, INC.

6520 GEORGIA STREET
DETROIT, MICHIGAN [illegible]
PHONE: (313) 57[illegible]
FAX: (313) 57[illegible]

DATE: 11/14/05

TO: Chris McBee

COMPANY: Double Eagle

FROM: Olivia [illegible]

RE: WASTE APPROVAL FORM MODIFICATION AUTHORIZATION

WASTE APPROVAL # 116729

WASTE TYPE: Grease

I HEREBY AUTHORIZE AND ACKNOWLEDGE THESE MODIFICATIONS TO MY WASTE APPROVAL FORM:

X COMPOSITION Cardboard boxes & ppe used during the removal of grease from equipment 0-25%

___ PROCESS _____

___ WASTE CODES _____

___ DOT DESCRIPTION _____

___ OTHER _____

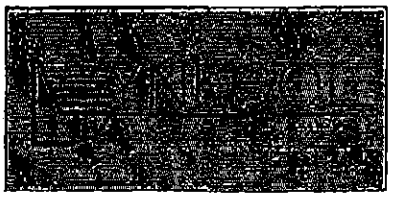
___ FINGERPRINT _____

X CHRISTOPHER McBee — PLEASE PRINT NAME

X Christopher McBee — SIGNATURE

X 11/16/05 — DATE

rev. 4/4/01



DYNECOL, INC.
6520 GEORGIA STREET
DETROIT, MICHIGAN 48211
PHONE: (313) 571-7140
FAX: (313) 571-7190

WASTE APPROVAL FORM

Grease

General Information					
Approval Number	164729		Cust./Gen.Code:	51	
Generator Name:	Double Eagle Steel Coating Co.				
Address:	0 Miller Rd.				
City:	Dearborn	State:	MI	Zip Code:	48120
Contact Name:	Chris McBee				
Phone Number:	313-363-1902		Fax Number:		313-203-9705
24 Hour Emergency #:					
EPA ID Number:	MID981092190		SIC Code:		
Customer Name:	Same.				
Customer Contact:					
Address:					
City:		**State:**		**Zip Code:**	
Phone Number:			**Fax Number:**		
24 Hour Emergency #:					

Waste Description	
Waste Common Name:	Grease
Specific Process Generating the waste:	Maintenance Operations at a Steel galvanizing plant. From equipment, pumps and process lines.

Grease

Constituent	Actual % of representative sample	Min. % of waste stream	Max. % of waste stream
Grease	100	95	100

A. Michigan Act 451 and EPA 40 CFR Information: (For the following, please use SW 846 test method for determination)

1. Is this a hazardous waste as defined by either R299.9212-9214 or 261 Subpart B,C, or D?

Check One: ____ YES X NO

a) *IF YES,* please list all applicable waste codes:

b) *IF NO*, please list all applicable non-hazardous waste codes as defined by Michigan Act 451 Part 121:

2. Does this waste indicate a volatile organic concentration in excess of 500 ppm or the compounds listed in 40 CFR 265 Appendix VI?:

Check One: ____ YES X NO

a) *IF YES*, please indicate constituents and concentrations:

3. Does the analysis indicate PCB's above the detection limit?

Check One: ____ YES X NO

a) IF YES, does the waste contain PCB contamination from a source with a concentration greater than or equal to 50 ppm?

Check One: ____ YES ____ NO

Please

B. Benzene/NESHAP Information (For the following, please use SW 846 method 8020 and/or EPA 602 and/or 624 for determination)

1. Does the waste stream have a benzene concentration of 10 ppm or more?

Check One: ____ YES X NO

IF YES, please indicate total benzene concentration of waste:

2. Does the waste stream contain greater than 10% water ?

Check One: ____ Yes X NO

3. Does the generator manage wastes from facilities with Total Annual Benzene (TAB) greater or equal to 10 mg/year?

Check One: ____ Yes X NO

IF YES, please indicate TAB quantity for generator facility:

C. Land Disposal Restriction Information (For the following, please see 40 CFR part 268.2 for definitions)

1. Does the waste stream contain less than 1% by weight Total Organic Carbon (TOC) and less than 1% by weight Total Suspended Solids?

Check One: ____ YES (wastewater) X NO (Non-wastewater)

Color Varies

pH 7-8

☐ Liquid ☐ Sludge/Slurry ☒ Solid

Odor:

☒ None ☐ Strong ☐ Mild

Phases

☒ Single Layer

☐ Double Layer

☐ Multi-Layer

A. Determination of shipping name as defined by 29 CFR 172.101:

1. Proper Shipping Name: Non Hazardous Solid

2. Hazard Class: —

3. UN/NA Number: —

4. Packing Group (Circle one): I II III None

B. Shipping Container (Circle one): Bulk (Drums) Pails Totes Roll Off Other:

C. Waste Volume: 2 x 55 gallon

D. Shipping Frequency (Circle one): Weekly Monthly Quarterly Yearly One Time Only

Please list any additional comments concerning this waste stream below:

A. Authorization to correct material profile sheet

I Christopher McBee (generator signature) hereby give authorization for Dynecol, Inc. to make corrections with oral authorization to establish consistency with the results of sample analysis and/or applicable federal and state regulations and the information on this profile. These changes WILL NOT include the addition or removal of waste codes and waste constituents which must have written authorization to be changed by the generator. I understand that Dynecol reserves the right to reject any material that does not conform to specifications described in profile.

B. Certification

I certify, under penalty of law, that I have personally examined, and am familiar with, the waste profiled through knowledge of the waste, and I believe the information submitted to be true, accurate, and complete.

CHRISTOPHER McBEE	ENVIRONMENTAL ENGINEER
Generator Name (Please print or type)	**Title**
Christopher McBee	8/11/05
Generator Signature	**Date**

Please list any revisions made to form

Revision	Date of Revision	Generator Authorization

A. Approval Information

CMF WASTES:		PLANT WASTES:	
Primary outbound approval number	Bay 17	Plant treatment code	
Off-site management code		On-site management code:	
WAF Initiator signature:			
Approved by:	S-O'Mara	Date:	9/1/2005

BSD/DM Att

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

May 05, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05041028

Reference: Grease

Dear Christopher McBee:

Clayton Group Services received 1 sample on 4/26/05 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

Clayton GROUP SERVICES

REQUEST FOR LABORATORY ANALYTICAL SERVICES

IMPORTANT
Date Results Requested: _____
Rush Charges Authorized? ☐ Yes ☐ No
☐ Fax or ☐ E-mail Results
E-mail address: _____

Page ____ of ____
For Clayton Use Only
Clayton Lab Project No.
05041028

REPORT RESULTS TO
Name CHRISTOPHER McBee
Company DESCC
Mailing Address 3000 MILLER RD
City, State, Zip Dearborn, MI 48120
Telephone No. _____ FAX No. _____

Client Job No. _____
Dept. _____

SEND INVOICE TO
Purchase Order No. _____
Name _____
Company _____ Dept. _____
Address _____
City, State, Zip _____

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)

* Explanation of Preservative

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request. Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	TCLP Metals										FOR LAB USE ONLY
Grease - Unknown	4/26	1215	SOLID		1	X										

CHAIN OF CUSTODY

Collected by: C. McBee (print) — Collector's Signature: _____
Relinquished by: C. McBee — Date/Time 4/26 1215 — Received by: _____ — Date/Time 1215
Relinquished by: _____ — Date/Time _____ — Received by: _____ — Date/Time _____
Method of Shipment: _____ — Received at Lab by: _____ — Date/Time 4/26
Sample Condition Upon Receipt: ☑ Acceptable ☐ Other (explain) 2.1

Authorized by: _____ Date _____
(Client Signature **MUST** Accompany Request)

Please return completed form and samples to one of the Clayton Group Services, Inc. labs listed below:

Detroit Regional Lab
22345 Roethel Drive
Novi, MI 48375
(800) 806-5887
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
3380 Chastain Meadows Parkway, Suite 300
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

Seattle Regional Lab
4636 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 568-7755
(206) 763-7364
FAX (206) 763-4189

5.7

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

9/97 20K

22345 Roethel Drive
Novi, MI 48375
248.344.1770
Fax 248.344.2654

Clayton GROUP SERVICES

August 19, 2005

Christopher McBee
DOUBLE EAGLE STEEL COATING COMPANY
3000 Miller Road
Dearborn, MI 48120-

Clayton Work Order No. 05080419

Reference:

Dear Christopher McBee:

Clayton Group Services received 3 samples on 8/9/2005 for the analyses presented in the following report.

Enclosed is a copy of the Chain-of-Custody record, acknowledging receipt of these samples. Please note that any unused portion of the samples will be discarded 30 days after the date of this report, unless you have requested otherwise.

This material is confidential and is intended solely for the person to whom it is addressed. If this is received in error, please contact the number provided below.

We appreciate the opportunity to assist you. If you have any questions concerning this report, please contact a Client Services Representative at (800) 806-5887.

Sincerely,

Karen Coonan

Karen Coonan
Client Services Representative

cc:

CASE NARRATIVE

Date: *19-Aug-05*

CLIENT: DOUBLE EAGLE STEEL COATING COMPANY

Project:

Work Order No 05080419

All quality control results associated with this sample set were within acceptable limits and/or do not adversely affect the reported results, unless otherwise noted below.

Samples were received at the laboratory at an average temperature of 5.4 °C.

ANALYTICAL RESULTS

Date: *19-Aug-05*

CLIENT:	DOUBLE EAGLE STEEL COATING COMPANY	**Client Sample ID:**	USED GREASE
Work Order No:	05080419	**Tag Number:**	
Project:		**Collection Date:**	8/9/2005
Lab ID:	05080419-003A	**Matrix:**	SOLID

Analyses	Result	Reporting Limit	Qual	Units	DF	Date Analyzed	Analyst
SW-846 METHOD 1030							
Ignitability	Negative	0		Positive/Neg	1	8/16/2005	CLH
PH, SOIL OR WASTE; METHOD EPA 9045C							
pH	7.2	1.0		pH Units	1	8/10/2005	HML
REACTIVE CYANIDE, EPA SW 846 CHAPTER 7.3.3.2							
Reactive Cyanide	ND	0.10		mg/Kg	1	8/15/2005	HML
REACTIVE SULFIDE; EPA SW 846 CHAPTER 7.3.4.2							
Reactive Sulfide	ND	100		mg/Kg	1	8/15/2005	HML

Qualifiers:

- ND - Not Detected at the Reporting Limit (RL).
- J - Analyte detected below the Reporting Limit
- B - Analyte detected in the associated Method Blank
- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- R - RPD outside accepted recovery limits
- E - Value above quantitation range
- T - Tentatively Identified Compound (TIC)

Exhibit N

Exhibit O

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
Waste and Hazardous Materials Division

SITE IDENTIFICATION VERIFICATION

Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.

DEQ

I. The form is being submitted (see instructions on page 6)

CHECK CORRECT BOX(ES)

- ☐ as initial notification: to notify as a new site or new owner for the site with previously issued site id number (include $50.00 user charge fee and submit the form and check to: DEQ OFFICE OF FINANCIAL MANAGEMENT)
- ☐ as subsequent notification: to change, update, or verify site information for an existing owner of a site with a previously issued site id number (submit to WHMD-MDEQ)
- ☐ as a component of the User Charge Packet
- ☐ as a component of a Hazardous Waste Permit Part A (submit to WHMD-MDEQ)
- ☒ as a component of the Hazardous Waste Report (biennial report) (submit to WHMD-MDEQ)

II. Site's ID Number

A. Site's Identification (ID) Number: MID981092190

III. Name of Site (instructions on page 8)

TYPE OR PRINT CLEARLY

A. Legal company name: DOUBLE EAGLE STEEL COATING CO

B. Site specific name (d/b/a): DOUBLE EAGLE STEEL COATING CO

III. Correct the Name of Site or add missing information below (TYPE OR PRINT CLEARLY)

A. Legal company name:	
B. Site specific name (d/b/a):	

IV. NAICS Code(s) (instructions - page 8)

A.332812 B. C. D.

IV. Correct the NAICS Code(s) for the Site or add new code(s) - up to four codes. (TYPE OR PRINT CLEARLY)

	A.	B.	C.	D.

V. Site Location Address and Other Site Information (instructions on page 8)

TYPE OR PRINT CLEARLY

Street Address: 3000 MILLER RD		
City, Town, or Village: DEARBORN	State: MI	
Province or Subdivision:	Country: U.S.A.	
County Name (MI only): WAYNE	Zip/Postal Code: 48120	
Federal Identification Number: 38XXXXX88	Approx./Ave. Number of Employees: 150	

V. Correct the Site Location Address and Other Site Information or add missing information. (TYPE OR PRINT CLEARLY)

Street Address:		Address 2	
City, Town, or Village:		State	
Province or Subdivision:		Country	
County Name (MI only):		Zip Code	
Federal ID Number:		Approx./Ave. Number of Employees	

VI. Site Mailing Address (instructions on page 8) TYPE OR PRINT CLEARLY	Street Address: 3000 MILLER RD	
	City, Town, or Village: DEARBORN	State: MI
	Province or Subdivision:	Country: U.S.A.
	County Name (MI only): WAYNE	Zip/Postal Code: 48120

VI. Correct the Site Mailing Address information or add missing information. (TYPE OR PRINT CLEARLY)			
Street Address:		Address 2	
City, Town, or Village:		State	
Province or Subdivision:		Country	
County Name (MI only)		Zip Code	

VII. Site Contact Person (instructions on page 9) TYPE OR PRINT CLEARLY	First Name: ~~MARK~~ Tom MI:	Last Name: ~~GORNICK~~ Kevin
	Phone Number: (313) 203-~~9829~~ 9810	Phone Number Extension:
	Email Address: Kevin@Descc.Com	Fax Number: 313-203-9821

VII. Correct the Site Contact Person information or add missing information. (TYPE OR PRINT CLEARLY)			
[contact person at the location site]	First Name:	MI:	Last Name:
	Phone Number: ( )	Phone Number Extension:	
	Email Address:	Fax Number: ( )	

VIII. Indian Reservation (instructions on page 9)	Facility on Indian Reservation Land: ☐ yes ☑ no

VIII. Correct the Indian Reservation Status (CLEARLY MARK THE CORRECT BOX)	
	Facility on Indian Reservation Land: ☐ yes ☐ no

X. Type of Regulated Waste Activity (Mark 'X' in the appropriate box(es), refer to instructions on page 9.)

A. Hazardous Waste Activity(ies) **at this location**

1. Generator of hazardous waste (choose one of the following three categories)

- [X] a. LQG: Greater than 1,000 kg/mo (2,200 lbs) of non-acute hazardous waste, or
- [ ] b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs) of non-acute hazardous waste, or
- [ ] c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

[see comments for additional information]

For items 2 through 8, check all that apply

2. Transporter of hazardous waste
- [ ] a. Transport hazardous waste
- [ ] b. Commingle waste
- [ ] c. Offloads during transportation **[requires a permit & registration]**

3. Designated facility (hazardous waste received from off-site)
- [ ] a. Treats waste on-site at this location
- [ ] b. Stores waste on-site at this location
- [ ] c. Disposes of waste on-site at this location
- [ ] d. Recycles recyclable materials on-site at this location **[required submittal of Part A & construction application]**

- [ ] 4. Underground injects waste on-site at this location
- [ ] 5. Import agent for hazardous waste
- [ ] 6. Generate mixed radioactive waste on-site at this location
- [ ] 7. Accepts waste from CESQG & accumulates over 1,000 kg on-site at this location

8. Exempt boiler and/or Industrial Furnace on-site at this location
- [ ] a. Smelting, melting, and refining furnace exemption
- [ ] b. Small quantity on-site burner exemption

B. Polychlorinated biphenyls (PCBs)

- [ ] Generated an item, product, or material containing a concentration equal to or greater than 100 ppm of PCB

C. Used Oil Activity(ies) **at this location,** check all that apply: (used oil generator only check E.2. below a Liquid Industrial Waste Generator)

1. Used Oil Fuel Marketer
- [ ] a. Marketer who directs shipments of off-specification used oil to used oil burner.
- [ ] b. Marketer who first claims the used oil meets the specifications

- [ ] 2. Off-specification Used Oil Burner

3. Used Oil Transporter (check one only)
- [ ] a. Transporter only
- [ ] b. Transporter with transfer facility **[requires a permit & registration]**

- [ ] 4. Used Oil Processor
- [ ] 5. Used Oil Re-refiner
- [ ] 6. Used Oil Collection or Aggregation Point
- [ ] 7. Collection Center or Aggregation Point that accepts DIY Used Oil

D. Universal Waste Activity(ies) **at this location,** check all that apply:

1. Large Quantity Handler

Type of Universal Waste	generating	accumulating
a. Batteries	[ ]	[ ]
b. Thermostats	[ ]	[ ]
c. Mercury Thermometers	[ ]	[ ]
d. Devices containing elemental mercury	[ ]	[ ]
e. Mercury Switches	[ ]	[ ]
f. Pesticides	[ ]	[ ]
g. Electric Lamps	[ ]	[ ]
h. Pharmaceuticals	[ ]	[ ]
i. Consumer Electronics	[ ]	[ ]

- [ ] 2. Destination Facility of Universal Waste (a hazardous waste permit may be required for this activity)

E. Liquid Industrial Waste Activities **at this location,** check all that apply: (not hazardous waste activity)
- [ ] 1. Liquid Industrial Waste Transporter **[requires a permit & registration]**
- [ ] 2. Transporting Own Waste
- [X] 3. Liquid Industrial Waste Generator
- [ ] 4. Liquid Industrial Waste Designated Facility

F. Generation of waste ceased or Site closed **at this location,** check one and enter the date (mm/dd/yyyy):
- [ ] 1. No longer generating hazardous, liquid industrial, or universal waste; still in business at this location
- [ ] 2. No longer generating hazardous, liquid industrial, or universal waste; out of business at this location

Date site is no longer generating waste: _____

XI. Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature of owner, operator, or authorized representative	**Name and Official Title (type or print)**	**Date Signed (mm-dd-yyy**
Thomas G. Linn	Plant Manager	3-20-06

IX. Owner and/or Operator of Site (instructions on page 9)

(You must enter at least one Owner and one Operator; each entity could be both an Owner and an Operator. Add any additional Owners or Operators on comment page.)

1. Site's Legal (check applicable box(es)) — Approx. date became owner &/or operator: 3/8/2004

☑ Owner ☑ Operator — Approx. date ceased as owner &/or operator:

Name: SEVERSTAL NA/US STEEL

Type (check one): ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

IX. Correct the Owner and/or Operator information or add missing information. (TYPE OR PRINT CLEARLY)

1. Site's Legal (check applicable box(es)) — Approx. date became owner &/or operator:

☐ Owner ☐ Operator — Approx. date ceased as owner &/or operator:

Name:

Type (check one): ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

2. Site's Legal (check applicable box(es)) — Approx. date became owner &/or operator:

☐ Owner ☐ Operator — Approx. date ceased as owner &/or operator:

Name:

Type (check one): ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

DOUBLE EAGLE STEEL COATING CO
DOUBLE EAGLE STEEL COATING CO
3000 MILLER RD
DEARBORN, MI 48120

HAZARDOUS WASTE USER CHARGE
HAZARDOUS WASTE (BIENNIAL) REPORTING PACKET
FOR 2006

Site activity user charge billing cycle:	01/01/2005 - 12/31/2005
Manifest user charge billing cycle:	10/01/2004 - 09/30/2005
Hazardous waste (biennial) report cycle:	01/01/2005 - 12/31/2005
Includes additional months of manifests:	10/01/2005 - 12/31/2005

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Michigan Department of Environmental Quality

Waste and Hazardous Materials Division
PO Box 30241, Lansing, Michigan 48909-7741

For questions or to request forms, please call:
Telephone: 517-335-5318

Invoice Number: **367771** Invoice Date: **1/27/2006**

DUE ON OR BEFORE APRIL 30, 2006

REMIT TO: MICHIGAN DEPT. OF ENVIRONMENTAL QUALITY
CASHIER'S OFFICE - HWUC
PO BOX 30657
LANSING, MI 48909-8157

Make check or money order payable to:
State of Michigan and include Invoice No. on check.

FISCAL YEAR 2006 HAZARDOUS WASTE USER CHARGE INVOICE

For: DOUBLE EAGLE STEEL COATING CO
MID981092190
WAYNE county

Located at: 3000 MILLER RD
DEARBORN, MI 48120

Fee Type (A)	Activity Start Date (B)	Corrected Activity Start Date (C)	Amount Generated / Number Processed (D)	Corrected Amount Generated / Corrected Number Processed (E)	Amount of User Charge (F)	Corrected Amount (G)
Manifest - number of manifests processed for shipments of hazardous waste ($8/manifest)			48		$384.00	
VLQG - hazardous waste generated > 900,000 kg ($1000)						
TSD - had licensed or interim status unit during the year ($2000)						
LQG - hazardous waste generated > 1,000 kg/mo and < 900,000 kg/yr ($400)	03/08/2004				$400.00	
SQG - hazardous waste generated > 100 kg/mo and < 1,000 kg/mo ($100)						
Used Oil - processed used oil during the year ($100)						
			Total Invoice:		$784.00	
				Corrected Total Invoice:		

I certify that the information contained on this form, to the best of my knowledge and belief, is true, accurate, and complete.

Issued under authority of PART 111 of PA 451 of 1994, as amended. Failure to sign this form and submit payment by the due date will result in penalty as prescribed by law.

Signature (REQUIRED) **Date**

Please Print Your Name

For DEQ Internal Use Only			For Cashier's Use Only
Payment Entered	**Site Data Entered**	**AR Data Entered**	
Staff Processing Comments			
EQP5104 (9/21/04)			

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HAZARDOUS WASTE USER CHARGES ANNUAL INVOICE
HAZARDOUS WASTE (biennial) REPORT PACKAGE INSTRUCTIONS

GENERAL INFORMATION: Under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the Michigan Department of Environmental Quality (MDEQ) is required to assess user charges to hazardous waste handlers by February 28 of each year. As part of the assessment, the MDEQ is required to provide the data used to determine the user charges. The MDEQ uses manifest and site identification data in its Waste Data System (WDS) to calculate both the handler and manifest processing user charges for waste activities associated with the past year. Additional information is available on the Internet at http://www.michigan.gov/deq by navigating to: WASTE, Hazardous and Liquid Industrial Waste, Hazardous and Liquid Industrial Waste Management, Information, and selecting Hazardous Waste User Charges. Sites are required to **return their invoice and user charge payment by April 30**.

Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the Michigan Department of Environmental Quality (MDEQ) requires large quantity generators and treatment, storage, or disposal facilities of hazardous waste to **submit a biennial report by March 1.**

INVOICE PACKAGE: The complete package includes the following items:

1. Hazardous Waste User Charge Invoice (Invoice) - EQP5104
2. Site Identification Verification Form (Form) - EQP5150V
3. Generator Manifest Confirmation Form (Manifest Form)
4. On-site Waste Generation and Management Form (EQP5145)

If any items are missing from your package, please contact the MDEQ at 517-335-5318 and leave a message, or send an e-mail to DEQ-HWUSERCHARGES@michigan.gov.

INVOICE INSTRUCTIONS: Please review the information shown on your Invoice. If any information is incorrect, please type or print the correct information. Column C is for a different Activity Start Date (for your highest status during the Invoice cycle), Column E is for manifest number corrections (only hazardous waste manifests between October 1, 2004 and September 30, 2005 and Column G is where corrected amounts on the various lines can be written. If your Invoice shows an incorrect status type for this billing, cross out the entire row and write the appropriate amount in Column G on the row associated with your correct status. If using Column G, also bring over any correct amounts in Column F, add all user charges in Column G, and write the sum of the corrected total Invoice amount in the provided box. Your payment will either reflect the amount in *Total Invoice* if there were no changes or the amount in *Corrected Total Invoice* if you made changes to the Invoice.

The handler or an authorized representative of the handler **shall sign and date** the Invoice. By signing, the handler certifies that all of the Invoice information is correct.

PAYMENT AND SUBMITTAL: Payment shall be made by check or money order and made payable to the "State of Michigan." We can not accept payment by credit card. To ensure proper credit of your payment, please include the words "User Charge" and the Invoice Number (found in the upper right corner of the Invoice) on the check or money order. The Invoice and payment are due to the MDEQ on or before April 30, and shall be mailed

to Michigan Department of Environmental Quality, Cashier's Office – HWUC, P.O. Box 30657, Lansing, MI 48909-8157 or for overnight delivery only (no U.S. mail), to the: Michigan Department of Environmental Quality, Cashier's Office – HWUC, 525 West Allegan Street, 5th Floor South, Lansing, MI 48933.

PENALTIES AND FINES: Failure to meet the Invoice payment submittal deadline of April 30 is a violation of Part 111 and subject to all applicable penalty and enforcement provisions. Late payment penalties accrue at 5 percent of the amount owed for each month that the payment is delinquent, up to a maximum of 25 percent.

SITE IDENTIFICATION VERIFICATION FORM INSTRUCTIONS: Please review the information shown on the Form. This is the information that reflects what is currently on file for the site. You are required to make changes, corrections, or additions and return the Form to the MDEQ as part of the Hazardous Waste (biennial) Report. For security reasons, your nine-digit Federal Identification Number (tax number) is denoted by the first two digits, then XXXs and the last two digits. Complete line-by-line instructions for the Form are available on the internet at http://www.michigan.gov/deq by navigating to: WASTE, Hazardous and Liquid Industrial Waste (left column), Hazardous Waste Program Forms and Permit Applications, Michigan Site Identification Form and Directions EQP5150. All returned Forms must have the corrections noted in the shaded boxes provided except for Section X where you are required to enter in all of the current site activity(ies). Then the form must be signed, dated and mailed with the Invoice to the Cashier's Office at the address above.

GENERATOR MANIFEST CONFIRMATION FORM INSTRUCTIONS: Please review the manifest information provided in your package. You must correct the pre-populated data or enter any missing data for 11. UN/NA; 12. Container No. & Type; 13, Total Quantity; 14. Unit Wt/Vol; and I. Waste No. You are also required to enter or verify the pre-populated data for the Management Code (Mgmt Code) and enter in the data for the Source Code in the gray shaded area for all hazardous waste. The Generator Manifest Confirmation forms must be mailed with the Invoice, Site Identification, On-site Waste Generation and Management Form, and Check to the Cashier's Office.

ON-SITE WASTE GENERATION AND MANAGEMENT FORM: If hazardous waste was generated and managed on-site this form must be completed for each waste stream.

CONTACTING THE MDEQ: If you have questions regarding your user charges, the Invoice, Site Identification Verification Form, or Manifest Form, please contact the MDEQ at 517-335-5318 and leave a message as appropriate given the menu options (Invoice – press 1, etc.) or you may send questions by e-mail to DEQ-HWUSERCHARGES@michigan.gov. If you need assistance regarding your generator status, District staff is available to help you. You can contact the District staff directly. To obtain their telephone number on the internet go to http://www.michigan.gov/deq/, click on Contact_DEQ (top of page), under Our Organization click on DEQ Locations.

CODES USED IN THE REPORT

Source codes describe the type of process or activity (i.e., source) from which a hazardous waste was generated. Review the groups and pick the appropriate code.

Wastes from Ongoing Production and Service Processes (waste from general day to day manufacturing, production, or maintenance activities)

G01 Dip, flush or spray rinsing (using solvents to clean or prepare parts or assemblies for further processing - i.e. painting or assembly)
G02 Stripping and acid or caustic cleaning (using caustics to remove coatings or layers from parts or assemblies)
G03 Plating and phosphating (electro- or non-electroplating or phosphating)
G04 Etching (using caustics or other methods to remove layers or partial layers)
G05 Metal forming and treatment (pickling, heat treating, punching, bending, annealing, grinding, hardening, etc.)
G06 Painting and coating (manufacturing, building, or maintenance)
G07 Product and by-product processing (direct flow of wastes from chemical manufacturing or processing, etc.)
G08 Removal of spent process liquids or catalysts (bulk removal of wastes from chemical manufacturing or processing, etc.)
G09 Other production or service-related processes from which the waste is a direct outflow or result (specify in comments)

Other Intermittent Events or Processes

G11 Discarding off-specification or out-of-date chemicals or products (unused chemicals or products - corresponds to P and U hazardous waste codes)
G12 Lagoon or sediment dragout and leachate collection (large scale operations in open pits, ponds, or lagoons)
G13 Cleaning out process equipment (periodic sludge or residual removal from enclosed processes including internal scrubbing or cleaning)
G14 Removal of tank sludge, sediments, or slag (periodic sludge or residual removal from storage tanks including internal scrubbing or cleaning)
G15 Process equipment change-out or discontinuation of equipment use (final materials and residuals removal including cleaning)
G16 Oil changes and filter or battery replacement (automotive, machinery, etc)
G19 Other one-time or intermittent processes (specify in comments)

Pollution Control and Waste Management Process Residuals

G21 Air pollution control devices (baghouse dust or ash from stack scrubbers or precipitators; vapor collection, etc.)
G22 Laboratory analytical wastes (used chemicals from laboratory operations)
G23 Wastewater treatment (sludge, filter cake, etc., including wastes from treatment before discharge by NPDES or POTW or by UIC disposal)
G24 Solvent or product distillation or recovery (sludge, waste solvent, bottoms, from recovery/recycling of used product)
G25 Hazardous waste management - indicate management method (for residuals from regulated hazardous waste treatment processes - enter the related H code)
G26 Leachate collection (from landfill operations or other land units)
G27 Hazardous residual from treatment or recovery of universal waste

Spills and Accidental Releases
G31 Accidental contamination of products, materials, or containers (other than G11)
G32 Cleanup of spill residues (infrequent, not routine)
G33 Leak collection and floor sweeping (ongoing, routine)
G39 Other cleanup of current contamination (specify in comments)

Remediation of Past Contamination
G41 Closure of hazardous waste management unit under RCRA
G42 Corrective action at a solid waste management unit under RCRA
G43 Remedial action or emergency response under Superfund
G44 State program or voluntary cleanup
G45 Underground storage tank cleanup
G49 Other remediation (specify in comments)

Waste Not Physically Generated On Site
G61 Hazardous waste received from off site for storage/bulking and transfer off site for treatment or disposal
For codes G63 - G75
Hazardous waste received from a foreign country (other than a foreign Department of Defense site, Maquiladora, U.S. territory or protectorate). This site was the generator of record and is the U.S. Importer.
Enter the appropriate code from the list below -
G63 Hazardous waste received from Antarctica
G64 Hazardous waste received from Aruba
G65 Hazardous waste received from Bahamas
G66 Hazardous waste received from Belgium
G67 Hazardous waste received from Brazil
G68 Hazardous waste received from Canada
G69 Hazardous waste received from Holland
G70 Hazardous waste received from Malaysia
G71 Hazardous waste received from Mexico
G72 Hazardous waste received from New Zealand
G73 Hazardous waste received from Taiwan
G74 Hazardous waste received from Venezuela
G75 Hazardous waste received from other foreign country - see Comments for country name

Management Method codes describe the type of hazardous waste management system used to treat, recover, or dispose a hazardous waste. Select the final substantive method used. Review the groups and pick the appropriate code.

Reclamation and Recovery
H010 Metals recovery including retorting, smelting, chemical, etc.
H020 Solvents recovery (distillation, extraction, etc)
H039 Other recovery or reclamation for reuse including acid regeneration, organics recovery, etc. (specify in comments)
H050 Energy recovery at this site - used as fuel (includes on-site fuel blending before energy recovery; report only this code)
H061 Fuel blending prior to energy recovery at another site (waste generated either on site or received from off site)

Destruction or Treatment Prior to Disposal at Another Site
H040 Incineration - thermal destruction other than use as a fuel (includes any preparation prior to burning)
H071 Chemical reduction with or without precipitation (includes any preparation or final processes for consolidation of residuals)
H073 Cyanide destruction with or without precipitation (includes any preparation or final processes for consolidation of residuals)
H075 Chemical oxidation (includes any preparation or final processes for consolidation of residuals)
H076 Wet air oxidation (includes any preparation or final processes for consolidation of residuals)
H077 Other chemical precipitation with or without pre-treatment (includes processes for consolidation of residuals)
H081 Biological treatment with or without precipitation (includes any preparation or final processes for consolidation of residuals)
H082 Adsorption (as the major component of treatment)
H083 Air or steam stripping (as the major component of treatment)
H101 Sludge treatment and/or dewatering (as the major component of treatment; not H071-H075, H077, or H082)
H103 Absorption (as the major component of treatment)
H111 Stabilization or chemical fixation prior to disposal at another site (as the major component of treatment; not H071-H075, H077, or H082)
H112 Macro-encapsulation prior to disposal at another site (as the major component of treatment;
not reportable as H071-H075, H077, or H082)
H121 Neutralization only (no other treatment)
H122 Evaporation (as the major component of treatment; not reportable as H071-H083)
H123 Settling or clarification (as the major component of treatment; not reportable as H071-H083)
H124 Phase separation (as the major component of treatment; not reportable as H071-H083)
H129 Other treatment (specify in comments; not reportable as H071-H124)

Disposal
H131 Land treatment or application (to include any prior treatment and/or stabilization)
H132 Landfill or surface impoundment that will be closed as landfill (to include prior treatment and/or stabilization)
H134 Deepwell or underground injection (with or without treatment; this waste was counted as hazardous waste)
H135 Discharge to sewer/POTW or NPDES (with prior storage - with or without treatment)

Transfer Off Site
H141 The site receiving this waste stored/bulked and transferred the waste with no treatment or recovery (H010-H129), fuel blending (H061), or disposal (H131-H135) at that receiving site.
Do not use this code on Form GM in Section 1- Box D or in Section 2.

UNIT OF MEASURE AND DENSITY

Enter the unit of measure (UOM) code for the quantity you reported in Box F. Report the quantity in one of the units of measure listed below. ***If you select a volumetric measure (gallons, liters, or cubic yards), you must also report the density of the waste.***

Code Unit of Measure
1 Pound
2 Short tons (2,000 pounds)
3 Kilograms
4 Metric tonnes (1,000 kilograms)
5 Gallons
6 Liters
7 Cubic yards

Report the density only if you entered code 5, 6, or 7 for the unit of measure. Provide the density either in pounds per gallon (lbs/gal) or specific gravity (sg) and mark the appropriate box to indicate which measure was used.

MIGHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
Waste and Hazardous Materials Division

SITE IDENTIFICATION VERIFICATION

Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.

DEQ

I. The form is being submitted (see instructions on page 6) CHECK CORRECT BOX(ES)	☐ as initial notification: to notify as a new site or new owner for the site with previously issued site id number (include $50.00 user charge fee and submit the form and check to: DEQ OFFICE OF FINANCIAL MANAGEMENT) ☐ as subsequent notification: to change, update, or verify site information for an existing owner of a site with a previously issued site id number (submit to WHMD-MDEQ) ☐ as a component of the User Charge Packet ☐ as a component of a Hazardous Waste Permit Part A (submit to WHMD-MDEQ) ☐ as a component of the Hazardous Waste Report (biennial report) (submit to WHMD-MDEQ)
II. Site's ID Number	A. Site's Identification (ID) Number: MID981092190
III. Name of Site (instructions on page 8) TYPE OR PRINT CLEARLY	A. Legal company name: DOUBLE EAGLE STEEL COATING CO B. Site specific name (d/b/a): DOUBLE EAGLE STEEL COATING CO
III. Correct the Name of Site or add missing information below (TYPE OR PRINT CLEARLY)	
A. Legal company name:	
B. Site specific name (d/b/a):	
IV. NAICS Code(s) (instructions - page 8)	A.332812 B. C. D.
IV. Correct the NAICS Code(s) for the Site or add new code(s) - up to four codes. (TYPE OR PRINT CLEARLY)	
	A. B. C. D.

V. Site Location Address and Other Site Information (instructions on page 8) TYPE OR PRINT CLEARLY	Street Address: 3000 MILLER RD		
	City, Town, or Village: DEARBORN	State: MI	
	Province or Subdivision:	Country: U.S.A.	
	County Name (MI only): WAYNE	Zip/Postal Code: 48120	
	Federal Identification Number: 38XXXXX88	Approx./Ave. Number of Employees: 150	

V. Correct the Site Location Address and Other Site Information or add missing information. (TYPE OR PRINT CLEARLY)			
Street Address:		Address 2	
City, Town, or Village:		State	
Province or Subdivision:		Country	
County Name (MI only):		Zip Code	
Federal ID Number:		Approx./Ave. Number of Employees	

VI. Site Mailing Address (instructions on page 8) TYPE OR PRINT CLEARLY		
	Street Address: 3000 MILLER RD	
	City, Town, or Village: DEARBORN	State: MI
	Province or Subdivision:	Country: U.S.A.
	County Name (MI only): WAYNE	Zip/Postal Code: 48120

VI. Correct the Site Mailing Address information or add missing information. (TYPE OR PRINT CLEARLY)			
Street Address:		Address 2	
City, Town, or Village:		State	
Province or Subdivision:		Country	
County Name (MI only)		Zip Code	

VII. Site Contact Person (instructions on page 9) TYPE OR PRINT CLEARLY		
	First Name: TOM MI:	Last Name: KEVIN
	Phone Number: (313) 203-9810	Phone Number Extension:
	Email Address: KEVIN@DESCC.COM	Fax Number: (313) 203-9821

VII. Correct the Site Contact Person information or add missing information. (TYPE OR PRINT CLEARLY)			
[contact person at the location site]	First Name:	MI:	Last Name:
	Phone Number: ( )	Phone Number Extension:	
	Email Address:	Fax Number: ( )	

VIII. Indian Reservation (instructions on page 9)	
	Facility on Indian Reservation Land: ☐ yes ☑ no

VIII. Correct the Indian Reservation Status (CLEARLY MARK THE CORRECT BOX)	
	Facility on Indian Reservation Land: ☐ yes ☐ no

IX. Owner and/or Operator of Site (instructions on page 9) (You must enter at least one Owner and one Operator; each entity could be both an Owner and an Operator. Add any additional Owners or Operators on comment page.)	
	1. Site's Legal (check applicable box(es)) Approx. date became owner &/or operator: 3/8/2004 ☑ Owner ☑ Operator Approx. date ceased as owner &/or operator:
	Name: SEVERSTAL NA/US STEEL
	Type (check one): ☑ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

IX. Correct the Owner and/or Operator information or add missing information. (TYPE OR PRINT CLEARLY)	
	1. Site's Legal (check applicable box(es)) Approx. date became owner &/or operator: ☐ Owner ☐ Operator Approx. date ceased as owner &/or operator:
	Name:
	Type (check one): ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other
	2. Site's Legal (check applicable box(es)) Approx. date became owner &/or operator: ☐ Owner ☐ Operator Approx. date ceased as owner &/or operator:
	Name:
	Type (check one): ☐ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

X. Type of Regulated Waste Activity (Mark 'X' in the appropriate box(es), refer to instructions on page 9.)

A. Hazardous Waste Activity(ies **at this location**

1. Generator of hazardous waste (choose one of the following three categories)
   - ☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs) of non-acute hazardous waste, or
   - ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs) of non-acute hazardous waste, or
   - ☐ c. CESQG: Less than 100 kg/mo of non-acute hazardous waste

   [see comments for additional information]

For items 2 through 8, check all that apply

2. Transporter of hazardous waste
   - ☐ a. Transport hazardous waste
   - ☐ b. Commingle waste
   - ☐ c. Offloads during transportation **[requires a permit & registration]**

3. Designated facility (hazardous waste received from off-site)
   - ☐ a. Treats waste on-site at this location
   - ☐ b. Stores waste on-site at this location
   - ☐ c. Disposes of waste on-site at this location
   - ☐ d. Recycles recyclable materials on-site at this location **[required submittal of Part A & construction application]**

4. ☐ Underground injects waste on-site at this location
5. ☐ Import agent for hazardous waste
6. ☐ Generate mixed radioactive waste on-site at this location
7. ☐ Accepts waste from CESQG & accumulates over 1,000 kg on-site at this location
8. Exempt boiler and/or Industrial Furnace on-site at this location
   - ☐ a. Smelting, melting, and refining furnace exemption
   - ☐ b. Small quantity on-site burner exemption

B. Polychlorinated biphenyls (PCBs)

☐ Generated an item, product, or material containing a concentration equal to or greater than 100 ppm of PCB

C. Used Oil Activity(ies) **at this location,** check all that apply: (used oil generator only check E.2. below a Liquid Industrial Waste Generator)

1. Used Oil Fuel Marketer
   - ☐ a. Marketer who directs shipments of off-specification used oil to used oil burner.
   - ☐ b. Marketer who first claims the used oil meets the specifications
2. ☐ Off-specification Used Oil Burner
3. Used Oil Transporter (check one only)
   - ☐ a. Transporter only
   - ☐ b. Transporter with transfer facility **[requires a permit & registration]**
4. ☐ Used Oil Processor
5. ☐ Used Oil Re-refiner
6. ☐ Used Oil Collection or Aggregation Point
7. ☐ Collection Center or Aggregation Point that accepts DIY Used Oil

D. Universal Waste Activity(ies **at this location,** check all that apply:

1. Large Quantity Handler

Type of Universal Waste	generating	accumulating
a. Batteries	☐	☐
b. Thermostats	☐	☐
c. Mercury Thermometers	☐	☐
d. Devices containing elemental mercury	☐	☐
e. Mercury Switches	☐	☐
f. Pesticides	☐	☐
g. Electric Lamps	☐	☐
h. Pharmaceuticals	☐	☐
i. Consumer Electronic	☐	☐

2. ☐ Destination Facility of Universal Waste (a hazardous waste permit may be required for this activity)

E. Liquid Industrial Waste Activities **at this location** check all that apply: (not hazardous waste activity)

- ☐ 1. Liquid Industrial Waste Transporter **[requires a permit & registration]**
- ☐ 2. Transporting Own Waste
- ☐ 3. Liquid Industrial Waste Generator
- ☐ 4. Liquid Industrial Waste Designated Facility

F. Generation of waste ceased or Site closed **at this location** check one and enter the date (mm/dd/yyyy):

- ☐ 1. No longer generating hazardous, liquid industrial, or universal waste; still in business at this location
- ☐ 2. No longer generating hazardous, liquid industrial, or universal waste; out of business at this location

Date site is no longer generating waste: _____

XI. Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature of owner, operator, or authorized representative	**Name and Official Title (type or print)**	**Date Signed (mm-dd-yyy**

XII. Comments:

If you did not submit this form through the MiTAPS e-Permitting electronic submittal system (htts://secure1.state.mi.us/epermits), you may need to add a comment and a date. Specifically, if there is a change in the activity status under 10.A.1.a-c or 10.C.1, 2, 4, or 5, from you current site activity, the actual data of the site activity change could impact the user fee. Please indicate below the actual date of the site activity change(s) at this site and add and explanation. Otherwise, the effective date of the site activity(ies), specified in Section X, will become effective on the certification date (Section XI). To determine the current site activity, go to the public website at http://www.deqstate.mi.us/wdspi.

XIII. Generator Manifest Confirmation

For all manifested hazardous waste shipped off-site, the waste information data is pre-populated in the row "Waste type line 00#", under columns 11-14 and I. If this data is not accurate please enter in the correct data in the box with shading marks in the row "Corrections line 00#". Then, for the pre-populated data in the row "Waste type line 00#", you must enter data in the row "Additional required data about waste type on line 00#", specifically the Management Code (Mgmt Code), the Source Code, and when the Source Code is G25 you must enter in a second Management Code for Source (Mgmt Code for Source).

Manifest Number MI9509036

Manifest Shipped Date 10/13/2004

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number MI9509037

Manifest Shipped Date 11/12/2004

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509038	**Attachments?**	No
Manifest Shipped Date	11/22/2004	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1400	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509008	**Attachments?**	No
Manifest Shipped Date	12/8/2004	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3300	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509039	**Attachments?**	No
Manifest Shipped Date	12/13/2004	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509048	**Attachments?**	No
Manifest Shipped Date	12/16/2004	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN3082	0	TT	2000	G	D007		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509040	**Attachments?**	No
Manifest Shipped Date	12/22/2004	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	1600	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number	MI9509041	**Attachments?**	No
Manifest Shipped Date	1/11/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	1800	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509051

Manifest Shipped Date	1/12/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				1300	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509052

Manifest Shipped Date	1/14/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				1000	G	029L
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509053

Manifest Shipped Date	1/14/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	0	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509055

Manifest Shipped Date 1/17/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	0	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509056

Manifest Shipped Date 1/17/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	0	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509057

Manifest Shipped Date 1/18/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9650018
Manifest Shipped Date 1/19/2005
Record Source TSD
Country, if not in the U.S.
Attachments? No
Gen copy submitted? No
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				3500	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509096
Manifest Shipped Date 1/20/2005
Record Source TSD
Country, if not in the U.S.
Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509097
Manifest Shipped Date 1/28/2005
Record Source TSD
Country, if not in the U.S.
Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509106

Manifest Shipped Date 1/31/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3077	1	CM	6000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509095

Manifest Shipped Date 2/3/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509117

Manifest Shipped Date 2/10/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509043

Manifest Shipped Date 2/14/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1400	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI8205396

Manifest Shipped Date 2/15/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509099

Manifest Shipped Date 2/16/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number	MI9835001	**Attachments?**	No
Manifest Shipped Date	2/17/2005	**Gen copy submitted?**	No
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				8000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number	MI9509161	**Attachments?**	No
Manifest Shipped Date	2/21/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3264	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number	MI9509148	**Attachments?**	No
Manifest Shipped Date	2/24/2005	**Gen copy submitted?**	No
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				6000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509149

Manifest Shipped Date	2/25/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3264	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9650470

Manifest Shipped Date	3/7/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				8000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9650490

Manifest Shipped Date	3/11/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				6000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9753580

Manifest Shipped Date	3/11/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				6000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509044

Manifest Shipped Date	3/14/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9847542

Manifest Shipped Date	3/15/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1		1100	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509150

Manifest Shipped Date	3/22/2005	**Attachments?**	No
Record Source	TSD	**Gen copy submitted?**	Yes
Country, if not in the U.S.		**Discrepancies or Rejected by TSD?**	No
		Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3500	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509134

Manifest Shipped Date	4/6/2005	**Attachments?**	No
Record Source	TSD	**Gen copy submitted?**	No
Country, if not in the U.S.		**Discrepancies or Rejected by TSD?**	No
		Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				7500	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number	MI9854842	**Attachments?**	No
Manifest Shipped Date	4/11/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1993	1	DF	9	G	U154
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (b) or 002	UN2924	1	DF	5	G	D001
Corrections line (b) or 002						

Additional required data about waste type on line (b) or 002	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (c) or 003	UN3264	1	DF	2	G	D002
Corrections line (c) or 003						

Additional required data about waste type on line (c) or 003	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (d) or 004		2	DF	15	G	029L
Corrections line (d) or 004						

Additional required data about waste type on line (d) or 004	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9847984

Manifest Shipped Date	4/13/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	7050	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509151

Manifest Shipped Date	4/14/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1500	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9509169

Manifest Shipped Date	4/19/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509167

Manifest Shipped Date 4/21/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9509162

Manifest Shipped Date 5/10/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2700	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9867552

Manifest Shipped Date 5/13/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? No

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				6800	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number	MI9921385	**Attachments?**	No
Manifest Shipped Date	5/25/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	NA1760	3	DF	110	G	D002
Corrections line (a) or 001						
Additional required data about waste type on line (a) or 001	Mgmt Code: H077		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (b) or 002	NA1760	2	TP	550	G	D002
Corrections line (b) or 002						
Additional required data about waste type on line (b) or 002	Mgmt Code: H077		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (c) or 003	UN1759	1	DF	80	P	D006
Corrections line (c) or 003						
Additional required data about waste type on line (c) or 003	Mgmt Code: H141		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest Number MI9509170

Manifest Shipped Date 5/31/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3082	1	TT	857	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509178

Manifest Shipped Date 6/9/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3266	1	TT	1800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9845471

Manifest Shipped Date 6/13/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? No

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				5507	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509191

Manifest Shipped Date	6/15/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002		
Corrections line (a) or 001								
Additional required data about waste type on line (a) or 001	Mgmt Code		Source Code		Source Code is G25 enter an additional Mgmt Code			
	H111							

Manifest Number MI9509193

Manifest Shipped Date	6/15/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002		
Corrections line (a) or 001								
Additional required data about waste type on line (a) or 001	Mgmt Code		Source Code		Source Code is G25 enter an additional Mgmt Code			
	H111							

Manifest Number MI9509196

Manifest Shipped Date	6/15/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002		
Corrections line (a) or 001								
Additional required data about waste type on line (a) or 001	Mgmt Code		Source Code		Source Code is G25 enter an additional Mgmt Code			
	H111							

Manifest Number	MI9509206	**Attachments?**	No
Manifest Shipped Date	6/21/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN3266	1	TT	3000	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9921813	**Attachments?**	No
Manifest Shipped Date	7/7/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1263	1	DM	55	G	D001
Corrections line (a) or 001						
Additional required data about waste type on line (a) or 001	Mgmt Code: H141		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (b) or 002	UN3264	1	DM	55	G	D002
Corrections line (b) or 002						
Additional required data about waste type on line (b) or 002	Mgmt Code: H077		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (c) or 003	UN3264	1	DM	55	G	D002
Corrections line (c) or 003						
Additional required data about waste type on line (c) or 003	Mgmt Code: H077		Source Code		Source Code is G25 enter an additional Mgmt Code	

Manifest Number MI9650496

Manifest Shipped Date	7/12/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	No
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001				4500	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9509089

Manifest Shipped Date	7/13/2005
Record Source	Generator
Country, if not in the U.S.	
Attachments?	No
TSD copy submitted?	No
Discrepancies or Rejected by TSD?	Full Rejection
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code

Manifest Number MI9509218

Manifest Shipped Date	7/14/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2200	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9509221	**Attachments?**	No
Manifest Shipped Date	7/25/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	2500	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9509236	**Attachments?**	No
Manifest Shipped Date	8/15/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9509255	**Attachments?**	No
Manifest Shipped Date	8/25/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9931007	**Attachments?**	No
Manifest Shipped Date	9/12/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1950	1	DF	2	P	D035
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number	MI9931008	**Attachments?**	No
Manifest Shipped Date	9/12/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1993	1	DM	55	G	D001
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (b) or 002	NA3082	1	DM	800	P	[redacted]
Corrections line (b) or 002						

Additional required data about waste type on line (b) or 002	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (c) or 003	UN1992	1	DM	16	G	D018
Corrections line (c) or 003						

Additional required data about waste type on line (c) or 003	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (d) or 004	UN1760	1	DF	1	G	D002
Corrections line (d) or 004						

Additional required data about waste type on line (d) or 004	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number MI9509267

Manifest Shipped Date 9/13/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3082	1	TT	1000	G	[redacted]
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	[redacted]		

Manifest Number MI9930996

Manifest Shipped Date 9/14/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	NA3082	1	TT	330	G	D027
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number MI9509283

Manifest Shipped Date 10/13/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3266	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9509292

Manifest Shipped Date	10/17/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509295

Manifest Shipped Date	10/17/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	6000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509296

Manifest Shipped Date	10/20/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509297

Manifest Shipped Date	10/20/2005	**Attachments?**	No
Record Source	TSD	**Gen copy submitted?**	Yes
Country, if not in the U.S.		**Discrepancies or Rejected by TSD?**	No
		Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509300

Manifest Shipped Date	10/27/2005	**Attachments?**	No
Record Source	TSD	**Gen copy submitted?**	Yes
Country, if not in the U.S.		**Discrepancies or Rejected by TSD?**	No
		Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001		1	TT	2000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509309

Manifest Shipped Date	11/7/2005	**Attachments?**	No
Record Source	TSD	**Gen copy submitted?**	Yes
Country, if not in the U.S.		**Discrepancies or Rejected by TSD?**	No
		Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	2800	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI10088241
Manifest Shipped Date 11/8/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	NA1760	1	TT	2509	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI10088298
Manifest Shipped Date 11/9/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	NA1760	1	TT	157	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9509311
Manifest Shipped Date 11/11/2005
Record Source TSD
Country, if not in the U.S.

Attachments? No
Gen copy submitted? Yes
Discrepancies or Rejected by TSD? No
Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	3000	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9509317	**Attachments?**	No
Manifest Shipped Date	11/18/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1719	1	TT	1800	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number	MI9509323	**Attachments?**	No
Manifest Shipped Date	11/22/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	TT	1500	G	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI10088376

Manifest Shipped Date 12/2/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1993	1	DF	7	G	D001
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (d) or 004	UN1760	1	DF	16	G	029L
Corrections line (d) or 004						

Additional required data about waste type on line (d) or 004	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509331

Manifest Shipped Date 12/7/2005

Record Source TSD

Country, if not in the U.S.

Attachments? No

Gen copy submitted? Yes

Discrepancies or Rejected by TSD? No

Commingled waste load? No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	TT	1500	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI9509332

Manifest Shipped Date	12/7/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3266	0	CM	30	Y	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H111		

Manifest Number MI10088710

Manifest Shipped Date	12/12/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN3266	4	DM	220	G	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H077		

Manifest Number MI9509346

Manifest Shipped Date	12/27/2005
Record Source	TSD
Country, if not in the U.S.	
Attachments?	No
Gen copy submitted?	Yes
Discrepancies or Rejected by TSD?	No
Commingled waste load?	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001	UN1760	1	CM	20	Y	D002
Corrections line (a) or 001						

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

Manifest Number	MI9509345	**Attachments?**	No
Manifest Shipped Date	12/28/2005	**Gen copy submitted?**	Yes
Record Source	TSD	**Discrepancies or Rejected by TSD?**	No
Country, if not in the U.S.		**Commingled waste load?**	No

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.		
Waste type line (a) or 001	UN1760	1	CM	20	Y	D002		
Corrections line (a) or 001								

Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code	Source Code is G25 enter an additional Mgmt Code
	H141		

XIV. Add data for any missing manifests for waste shipped off site. (TYPE OR PRINT CLEARLY. Copy this page if submitting data for more than one missing manifest.)

Manifest Number		**Attachments?**
Manifest Shipped Date		**Discrepancies or Rejected by TSD?**
Record Source		**Commingled waste load?**
Country, if not in the U.S.		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (a) or 001						
Additional required data about waste type on line (a) or 001	Mgmt Code	Source Code		Source Code is G25 enter an additional Mgmt Code		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (b) or 002						
Additional required data about waste type on line (b) or 002	Mgmt Code	Source Code		Source Code is G25 enter an additional Mgmt Code		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (c) or 003						
Additional required data about waste type on line (c) or 003	Mgmt Code	Source Code		Source Code is G25 enter an additional Mgmt Code		

Manifest data	11. UN/NA	12. Container No	12. Container Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste type line (d) or 004						
Additional required data about waste type on line (d) or 004	Mgmt Code	Source Code		Source Code is G25 enter an additional Mgmt Code		

DEQ

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION

SITE NAME: ***DOUBLE EAGLE STEEL COATING CO***
SITE ID NO: ***MID981092190***

Hazardous Waste Report
ON SITE WASTE GENERATION
AND MANAGEMENT FORM

Sec. 1 Data is required for all fields unless indicated (optional).

ON-SITE GENERATION

A. Hazardous Waste description (optional)

B. EPA hazardous waste code(s)

C. Michigan hazardous waste code(s)

D. Source code (primary)

E. Radioactive mixed
☐ yes ☐ no

F. Unit of Measure

G. Management Method code if the Source code is G25

H. Quantity generated

I. Density
☐ lbs/gal
☐ sg

Sec. 2 For the hazardous waste reported in Box A. A separate form must be completed for each management method.

ON-SITE PROCESS SYSTEM 1

On-site Management Method | Quantity treated, disposed, or recycled on-site

ON-SITE PROCESS SYSTEM 2

On-site Management Method | Quantity treated, disposed, or recycled on-site

ON-SITE PROCESS SYSTEM 3

On-site Management Method | Quantity treated, disposed, or recycled on-site

Comments: